INSPECTION FACT SHEET

COMPANY NAME: Bombardier Aerospace
dba West Virginia Air Center

I.D.#: WVD988776852

MAILING ADDRESS: 2400 Aviation Way
Bridgeport, WV 26330

TYPE OF FACILITY: LQG

LOCATION: Benedum Airport

COUNTY: Harrison

COMPANY CONTACT: Bill Pulling

HANDLING CODES: S01

PHONE: (304)842-6300

PURPOSE: To conduct a Compliance Evaluation Inspection

APPLICABLE REGULATIONS: West Virginia Hazardous Waste Management Act, Chapter 22-18: West Virginia Administrative Regulations for Chapter 22-18; and/or 40 CFR Parts 260 thru 279

LIST OF CHEMICALS:
(For Small Quantity Generators, list amount of waste, how it is handled, where it goes)

____ DETERMINATION PENDING

____ NOT APPLICABLE

__X__ VIOLATIONS

_____ NO VIOLATIONS

DATE INSPECTED: January 27-28, 2000

INSPECTOR: (1) Joyce Moore, West Virginia Division of Environmental Protection, Office of Waste Management, Fairmont District Office

(2) Stan Moskal, West Virginia Division of Environmental Protection, Office of Waste Management, Martinsburg Field Office

PREPARED BY: Joyce Moore, Office of Waste Management

Inspection Report

Re:	West Virginia Air Center, Bridgeport, WV (WVD988776852)
Inspectors:	Joyce Moore, West Virginia Division of Environmental Protection Office of Waste Management, Fairmont District Office
	Stan Moskal, West Virginia Division of Environmental Protection Office of Waste Management, Martinsburg Field Office
Date:	January 27-28, 2000
Prepared By:	Joyce Moore, West Virginia Division of Environmental Protection

On January 27, 2000, Environmental Inspector, Joyce Moore conducted a Compliance Evaluation Inspection of West Virginia Air Center in Bridgeport, West Virginia. Upon arrival at 11:08 a.m. the above inspector was met by Frank Crislip, Quality Assurance Engineer.

Upon presentation of the appropriate credentials, the above inspector advised the facility representative of her authority as a representative of the Director of the Division of Environmental Protection pursuant to Chapter 22 of the Code of West Virginia and as specified in Section 3007(a) of the Resource Conservation and Recovery Act. He acknowledged this authority. The facility representative was further advised that this inspection would emphasize the company's compliance with the Hazardous Waste Management Act (Chapter 22, Article 18) and the regulations promulgated thereunder.

This facility performs a variety of maintenance services for aircraft. Most of the hazardous wastes generated at this facility are a result of the stripping and painting services they provide. The hazardous wastes generated by this facility include, waste paint solids debris, waste paint liquid, alodine and etch rags, stripping liquids, stripping tank solids, aerosol cans and contaminated absorbent. Additional regulated wastes include waste oil, filters, batteries, and florescence bulbs.

The first area inspected was Bay 3, primarily used for the stripping and painting operations. The aircraft are washed and all fuel removed before they are placed into this bay. Once an aircraft is stripped with a formic acid stripper, it is then etched with phosphoric acid, coated with alodine, then primed and painted. Upon inspection the hazardous waste storage area, in Bay 3, contained approximately (19) nineteen drums of hazardous waste. Four drums of hazardous waste were not closed, in violation of 40 CFR 265.173(a) as referenced by 262.34. (See Photos # 3-5). Two drums of hazardous waste had no accumulation start dates and also no hazardous waste labels theses are violations of 40 CFR 262.34(a)(2) and 40 CFR 262.34(a)(3) respectively.

Three drums of hazardous waste had been stored for greater than ninety days in violation of 40 CFR 262.34(b). (See Photos # 6 & 7). One drum of hazardous waste had no accumulation start date this is in violation of 40 CFR 262.34(a)(2). Aisle space in the drum storage area was nonexistent and therefore inadequate to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the event of an emergency, this is in violation of 40 CFR 265.35 as referenced by 262.34(a)(4). (See Photos 1-3). The lack of aisle space was also documented on August 24, 1999, during an inspection conducted by the Office of Air Quality. (See Attachment A).

When an aircraft is brought in for service or painting the majority of the fuel on board is pumped off into a fuel truck, then the remaining fuel is drained into a fuel sump cart in the Maintenance Bay, Bay # 4. Ten percent of the fuel pumped off into the fuel truck is returned to the same aircraft it was removed from. The remaining fuel in the fuel truck is shipped off-site as an off-spec fuel by Petroleum Recyclers and Environmental Services Inc. (See Attachment B). According to the facility representative the FFA Regulations limit the amount fuel that can be returned to the aircraft. The Jet A Fuel MSDS lists a flash point range of 100-150 F, the RCRA Classification is listed as Ignitable (D001), the Hazardous Components as Benzene, Toluene, Xylene, and Trimethylbenzene. (See Attachment C).

The fuel sump cart was not labeled as off-spec fuel, used oil, hazardous waste or other words to identify the contents, labeling of the fuel sump cart was discussed with the facility representatives at the time of the inspection. Following further review of applicable regulations and this agency's guidance documents, the off-spec Jet A Fuel is not a solid waste and therefore is not a hazardous waste. The unmarked fuel sump cart is not in violation of RCRA, however, the labeling and shipping rules and regulations under OSHA and DOT are applicable to this off-spec commercial chemical product.

Jet A Fuel that is not returned to the aircraft or managed as an off-spec fuel in the fuel truck parked outside, is placed into satellite accumulation drums located inside Bay 4 or the hazardous material storage room. The facility commingles this jet fuel with their waste oil. The waste oil/jet fuel mix is manifested off-site as a hazardous waste to Chemical Conservation of Georgia, Inc. in Valdosta, Georgia. (See Attachment D)

The satellite accumulation area in Bay 4 was found to contain six drums accumulating different hazardous waste streams. (See Photo # 9). Five of the six drums were not in compliance with the applicable regulations. Five drums were not closed this is another violation of 40 CFR 265.173(a) as referenced by 262.34. One of these five open containers of hazardous waste was not labeled nor dated, this is in violation of 40 CFR 262.34(c)(1)(ii) and 40 CFR 262.34(a)(2) respectively.

Bay 4, the maintenance bay, was also the location where hazardous wastes were found in two of the "Trash Only" barrels. (See Photos 11, 14 & 15).

The first instance of the improper waste disposal was contaminated absorbent, specifically pig matting discarded into the trash only barrel. According to the facility representative this waste stream is accumulated in a drum in the satellite accumulation area and managed as a hazardous waste. Mr. Crislip's statement was consistent with this inspector's observations, photo # 9 of an overflowing open container of contaminated pig matting, and the Waste Stream Summary provided to this inspector. (See Photo # 9 and Attachment E).

The second instance of the improper waste disposal was solvent contaminated rags discarded into the "Trash Only" barrel. (See Photos 14 & 15). According to the workers in the maintenance bay, a propeller was wiped down with lacquer thinner. The container this solvent was dispensed from was located in the paint shop and an MSDS for that solvent was obtained. (See Attachment F). The container was labeled as Jet Glo-Acryglo, Med Temp Thinner. The solvent on the rags disposed of in the trash contained, before use, ten percent or more of the following: toluene, ethyl acetate, and cyclohexanone, according to information on the MSDS, these hazardous ingredients have corresponding hazardous waste codes F005, F003 and F003 respectively.

Disposal of hazardous waste as identified or listed in 40 CFR part 261 without the required permit is in violation of 40 CFR 270.1(c). The seriousness of this violation was discussed with the facility representatives, William E. Pulling, Troy T. Jonas, and Frank C. Crislip, at the conclusion of this inspection. During this discussion they were advised that the Hazardous Waste Management Act, (Chapter 22, Article 18, Section 16) of the Code of West Virginia provides criminal penalties for transportation, treatment, storage, and disposal of hazardous waste without a permit.

The paint shop was inspected and found to contain two fifty-five gallon drums accumulating hazardous waste, one for liquids and the second one for solids. (See Photo # 8). The drum on the right in photo # 8 was not labeled with the words hazardous waste or other words to identify the contents, again this is in violation of 40 CFR 262.34(a)(3).

The chemical storage room was inspected and found to contain one drum, labeled as hazardous waste, accumulating used oil, hydraulic fluid, and Jet A fuel. The facility representative, Frank Crislip, was informed that the regulations require that used oil managed under 40 CFR part 279 be marked with the words "Used Oil". Mr. Crislip explained that the used oil in this area was managed as a hazardous waste, because West Virginia Petroleum Recyclers either did not want the mixed waste or did not want to come inside the facility to get the waste.

The area outside the chemical storage room had a number of containers accumulating on the floor. (See Photo # 10). Among these was a small salvage drum that upon opening was found to contain a one gallon container of solvent that was leaking. The fact that the salvage drum was not labeled or marked with other words to identify the contents, is another violation of 40 CFR 262.34(a)(3). There was also a one gallon paint can, containing spent solvent, the can was open and not labeled, again these are violations of 265.173(a) as referenced by 262.34; and 40 CFR 262.34(a)(3). The facility had not made hazardous waste determinations on the containers of out dated or off-spec products accumulating in this area, in violation of 40 CFR 262.11. The leaking container in the salvage drum was taken to the satellite accumulation area to be transferred into the satellite accumulation drum.

The outside storage area was inspected. This area is used for storing equipment, empty containers, etc. and is typically not a hazardous waste storage area. There were no concerns noted in this area.

The floor drains in Bay 3, the stripping bay, flow into a 300 gallon stainless steel tank installed in a concrete vault in the ground, outside of Bay 3. The tank and containment system were inspected following the removal of the steel plate over the system. (See Photos 12 & 13). Accumulated in this sump tank are stripping wastes that contain cadmium, chromium, formic acid, lead, and water, according to the waste profile and waste analysis obtained from the facility. (See Attachments G & H). The sump tank is equipped with an automatic pump that pumps the waste to a larger above ground storage tank inside Bay 3. The sump tank is labeled "Danger Hazardous Materials" however it was not labeled as hazardous waste or with other words that properly identified the contents, again this is in violation of 262.34(a)(3).

The secondary containment for the sump tank is equipped with a high level alarm, once the tank overflows and the contents in secondary containment reach a high enough level the high level alarm would activate. The sump tank itself, however is not equipped with overfill prevention controls, this is in violation of 40 CFR 265.194(b) as referenced by 262.34(a)(1)(ii). The purpose of the overflow prevention controls on the tank system is to prevent tank overflows, having the alarm float activated by liquids in the secondary containment is not a preventive overflow measure.

Upon inspection of the secondary containment accumulated liquids were observed. The quantity of liquids accumulated were not sufficient to activate the high level alarm. Visual inspection alone was insufficient to determine if the liquids were a result of overflow from the sump tank and/or from rainwater accumulating in the secondary containment area. There were no records at the facility to indicate a waste determination had ever been performed on the liquids in the containment area. Liquids were also noted in this secondary containment on August 24, 1999, during an inspection conducted by the Office of Air Quality. (See Attachment A.)

The facility representative explained that the liquids in the secondary containment were probably just rainwater. Either way it would be pumped out once the float activated the high level alarm. Rainwater and/or tank overflow would be managed as stripper waste. This inspector expressed concern that no waste determination had been made on the contents in the secondary containment especially given how quickly chromium can move though concrete. This inspector informed the facility representative the intent to sample the contents in the secondary containment area upon completion of the inspection.

The facility representative advised that the concrete had been sealed. Upon request he attempted to locate specifications on the sealer that had been used. The specific name of the sealer used and the specifications for the sealer could not be located at the time of this inspection.

Spilled or leaked waste and accumulated precipitation is not removed from the secondary containment system within 24 hours, or in as timely manner as possible to prevent harm to human health or the environment, if the removal of the released waste or accumulated precipitation cannot be accomplished within 24 hours, this is in violation of 40 CFR 265.193(c)(4). Removal of the accumulated precipitation can be accomplished within 24 hours if the unit is diligently operated, however upgrading the design to prevent the accumulation of precipitation should be given consideration.

Other concerns noted are the design of this secondary containment vault system, if it is adequately designed to prevent run-on or infiltration of precipitation, and sloped or otherwise designed to drain and remove liquids resulting from leaks, spills or precipitation, did construction include chemical-resistant water stops in place at all joints, and was the sealer used adequate to provide an impermeable interior coating that is compatible with the stored waste and that will prevent migration of waste into the concrete.

Bays 1 and 2 were also inspected. Normally these bays are used strictly for maintenance and no hazardous waste are generated. However, occasionally hazardous materials are used in small quantities. For example in Bay 1, toluene and paint may be used to touch up the paint on screws or drill holes, and in Bay 2, small amounts of alodine may be used to etch small parts. There were no violations noted in Bays 1 or 2.

A copy of the contingency plan was reviewed with the facility representative. The plan did not list names and phone numbers (office and home) of all persons qualified to act as emergency coordinator. Two of the phone numbers listed were not kept current. There were no addresses listed for any of these persons. The Primary Emergency Coordinator was not named in the plan, nor were alternates listed in the order in which they will assume responsibility, these items are in violation of 40 CFR 265.52(d) as referenced by 262.34(a)(4). (See Attachment I).

Several of the documents requested were provided at the time of this inspection, other documents were not readily available. Mr. Crislip, Quality Assurance Engineer, was filling in for William Pulling, Manager, Environmental, Health & Safety, who was off due to illness. Although Mr. Crislip was familiar with the requirements and operations at the facility, locating the paperwork maintained by Mr. Pulling was difficult. It was decided that the inspection would be continued the following day, this would provide the facility more time to locate documents to demonstrate compliance and provide this inspector an opportunity to collect the sample from the secondary containment area.

On January 28, 2000, the above inspector returned to the facility with Environmental Inspector Supervisor, Stan Moskal. Upon our arrival we were met by William Pulling. Mr. Pulling was presented with the appropriate credentials and advised of our authority. He acknowledged our authority. Mr. Pulling stated that Frank Crislip had informed him of what was found yesterday and what paperwork we were needing.

We initially discussed some of the violations noted on the day before and agreed to a meeting to summarize the inspection findings with his General Manager, Troy Jones, and anyone else they wished, after we finished the inspection.

We proceeded to the sump tank outside of Bay 3 to collect a sample from the secondary containment area. The fork lift utilized to lift the steel plate cover would not start so we went back inside. During this time some of the areas where violations had been noted on the previous day were pointed out to the facility representative and/or this inspector's supervisor.

The 8000 gallon hazardous waste tank used for less than 90 day storage that is located inside Bay 3 was discussed with the facility representative. This tank is equipped with a crude overfill prevention control device consisting of a stick mounted on a float. The stick is visually inspected to determine when the tank is full. According to facility personnel, this tank has been overfilled, and the contents were contained in the secondary containment. This tank receives waste from the 300 gallon sump tank outside of Bay 3 which has an automatic feed pumping hazardous waste inside to this tank. There are no automatic feed cutoff devices, no high level alarm systems (visual or audible), nor is a by-pass to a standby tank provided. The overflow valve has been capped and sealed, this is an area of concern due to the fact that the tank is vented to the outside ambient air. In the event of an overflow the float could form a seal or restrict the flow of the waste from overtopping the tank into the secondary containment area and instead the waste could overflow out the vent pipe resulting in an uncontrolled release.

Mr. Pulling was informed that this inspector had advised Mr. Crislip that the tank needed to be emptied of it's contents every 90 days. Basically the solids needed to be removed and shipped off site quarterly instead of storing them in the tank. According to facility personnel,

the tank solids are only removed about once every two years now, and the solids are currently about two feet deep in the tank. The facility is storing hazardous waste (stripping waste solids) in the tank for greater than ninety days without a permit or an extension, this is in violation of 40 CFR 262.34(b). The liquid portion of the hazardous waste stored in this tank is manifested off-site to Waste Management of Ohio, Inc. in Vickery, Ohio, for deep well injection, every ninety days or less. (See Attachment J).

Given the number of open containers accumulating hazardous waste previously referenced on pages 1-4 of this report; the improper disposal of hazardous waste into "trash only" containers at this facility as documented on page 3 of this report, and the liquids accumulating in the secondary containment system of the sump tank outside of Bay 3, it was determined that this facility is not maintained and operated to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment, this is in violation of 40 CFR 265.31.

Samples were collected from the secondary containment system from the sump tank outside of Bay 3 at 12:05 p.m. A "Receipt for Sample" was issued to the facility. (See Attachment K). The samples were analyzed for TCLP metals, TCLP volatile organics, and TCLP semi-volatile organics. The lab results indicate that there were no leachable hazardous waste constituents detected, at the detection limits given on the laboratory reports. (See Attachment L).

The facility's contingency plan does not describe the arrangements agreed to by local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services, pursuant to 265.37, this is in violation of 40 CFR 265.52(c) as referenced by 262.34(a)(4). The plan does mention that the Bridgeport Fire Department, Harrison County Emergency Services, and United Hospital Center's Environmental Team have toured the facility to be familiarized with the hazardous materials and processes at the facility. (See Attachment I).

Three police departments are listed on the list of emergency telephone numbers, however, a specific police department has not been designated primary emergency authority, this is in violation of 40 CFR 265.37(a)(2) as referenced by 262.34(a)(4). (See Attachment I).

The facility's contingency plan does not include a list of all emergency equipment (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), nor does it include the location and a physical description of each item on the list, and a brief outline of its capabilities, this is in violation of 265.52(e) as referenced by 262.34(a)(4). (See Attachment I).

The facility did not review and immediately amend the contingency plan when the list of emergency coordinators changed due to personnel changes, this is in violation of 40 CFR 265.54(d). The Emergency Action/Contingency Plan is dated 10-16-97, and the date on the List of Emergency Phone Numbers is 10-9-97. (See Attachment I).

Employee training was discussed with the facility representatives. The records and documents provided by the facility upon request were insufficient for demonstrating compliance with the personnel training requirements pursuant to 40 CFR 265.16. The records provided however, were reviewed.

The facility had a written copy of the training manual for the safety training that was to be given to the employees in 1999 and a Safety Training Plan. (See Attachments M and N respectively). The regulations require the facility to have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management. The facility did not have the required written description, this is in violation of 40 CFR 265.16(d)(3) as referenced by 40 CFR 262.34(a)(4).

The facility provided a list of employees and job titles for facility personnel. (See Attachment O). The regulations require the facility to maintain records that include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job. The list provided, lists personnel who do not have positions related to hazardous waste management and does not list some personnel who do have positions that are related to hazardous waste management, this is in violation of 40 CFR 265.16(d)(1) as referenced by 40 CFR 262.34(a)(4).

The facility was unable to provide a written job description for each position related to hazardous waste management, this is in violation of 40 CFR 265.16(d)(2). This description must include requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position related to hazardous waste management.

The facility did not have records that document that the training or job experience required under 265.16 (a), (b), and (c) have been given to, and completed by, facility personnel, this is in violation of 40 CFR 265.16 (d)(4) as referenced by 40 CFR 262.34(a)(4).

There was a lengthy closing discussion with the facility representatives to summarize the items of non-compliance noted at the facility during this two day inspection. Items discussed included the physical conditions of the waste management areas, the training records and the contingency plan.

Concern was expressed in regards to the facility's choice to designate the Director, Human Resources as the person with authority to implement the contingency plan, until the Local Fire Chief is on scene. The Local Fire Chief has authority over the command center until the response activity ceases then authority reverts back to the Director of Human Resources.

In accordance with 40 CFR 265.55, the facility needs to consider designating a Primary Emergency Coordinator and alternates, who are thoroughly familiar with all aspects of the facility's contingency plan, all operations and activities at the facility, the location and characteristics of waste handled, the location of all records within the facility, and the facility layout, and have the authority to commit the resources needed to carry out the plan.

The emergency procedures the emergency coordinator must perform are given in 40 CFR 265.56 in detail. Upon revision of the facility's contingency plan these procedures should be considered for incorporation into the plan.

We suggested that the facility representatives call us if they had any questions about what was discussed or what they needed to do to correct the items of non-compliance that were summarized. We then thanked the facility representatives for their cooperation and departed the facility.

Waste Minimization

The facility was not asked to provide a copy of their written waste minimization plan. Waste minimization was not discussed with facility personnel during this inspection.

Compliance Evaluation

Please refer to the "Notice of Violation" for the violations cited during this inspection.

BUREAU OF ENVIRONMENT

DIVISION OF ENVIRONMENTAL PROTECTION

CECIL H. UNDERWOOD
GOVERNOR

Office of Waste Management

MICHAEL C. CASTLE
DIRECTOR

NOTICE OF VIOLATION

DATE: January 28, 2000 TIME: 12:30 p.m.

ISSUED TO: Bombardier Aerospace d.b.a. West Virginia Air Center

EPA I.D.#: WVD988776852

FACILITY MAILING ADDRESS: 2400 Aviation Way Bridgeport, WV 26330

FACILITY REPRESENTATIVE: William E . Pulling

On the date and time specified, an authorized agent of the Chief of the Office of Waste Management conducted an inspection of the facility described above in accordance with West Virginia Code, Chapter 22, Section 18 and/or an Order or Permit issued pursuant to §22-18. During that inspection the following violation(s) were noted:

1.A. (Regulation) 40 CFR 265.173(a) as referenced by 262.34(a)(1)(i) as referenced by 33 CSR 20-5.1

B. (Facts) Containers holding hazardous waste were not kept closed.

2.A. 40 CFR 262.34(a)(2) as referenced by 33 CSR 20 Section 5.1

B. Containers holding hazardous waste were not marked with accumulation start dates

3.A. 40 CFR 262.34(a)(3) as referenced by 33 CSR 20 Section 5.1

B. The 300 gallon tank and other containers holding hazardous waste were not labeled or marked with the words "Hazardous Waste".

4.A. 40 CFR 262.34(b) as referenced by 33 CSR 20 Section 5.1

B. Hazardous waste has been stored on site for greater than ninety days without a permit, or an extension, this storage occurred in at least three containers and one tank.

5.A. 40 CFR 265.35 as referenced by 262.34(a)(4) as referenced by 33 CSR 20 Section 5.1

B. Aisle space in the drum storage area was not maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment in the event of an emergency.

6.A. 40 CFR 262.34(c)(1)(ii) as referenced by 33 CSR 20 Section 5.1

B. Containers holding hazardous waste in the satellite accumulation area were not marked with the words "Hazardous Waste" or other words that identified the contents.

7. A. (Regulation) 40 CFR 270.1(c) as referenced by 33 CSR 20 Section 11

B. Disposed of hazardous waste as identified or listed in 40 CFR part 261 without the required permit.

8. A. 40 CFR 262.11 as referenced by 33 CSR 20 Section 5.1

B. The facility had not made hazardous waste determinations on the containers of out dated or off-spec products accumulating outside the chemical storage room.

9. A. 40 CFR 265.194(b)(2) as referenced by 262.34(a)(1)(ii) referenced by 33 CSR 20-5.1

B. The 300 gallon sump tank is not equipped with overfill prevention controls.

10.A. 40 CFR 265.193(c)(4) referenced by 262.34(a)(1)(ii) referenced by 33 CSR 20-5.1

B. Spilled or leaked waste and accumulated precipitation is not removed from the secondary containment system within 24 hours, or in as timely manner as possible to prevent harm to human health or the environment.

11.A. 40 CFR 265.52(d) as referenced by 262.34(a)(4) referenced by 33 CSR 20-5.1

B. The contingency plan did not list names and phone numbers (office and home) of all persons qualified to act as emergency coordinator. The list was not kept up to date. There were no addresses listed. The Primary Emergency Coordinator was not named in the plan, and others were not listed in the order in which they will assume responsibility as alternates.

12.A. 40 CFR 265.31 as referenced by 262.34(a)(4) as referenced by 33 CSR 20 Section 5.1

B. This facility is not maintained and operated to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil, or surface water which could threaten human health or the environment.

13.A. 40 CFR 265.52(c) as referenced by 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility's contingency plan does not describe the arrangements agreed to by local police departments, fire departments, hospitals, contractors and State and local emergency response teams to coordinate emergency services, pursuant to 265.37.

14.A. 40 CFR 265.37(a)(2) as referenced by 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. Three police departments are listed on the list of emergency telephone numbers, however, a specific police department has not been designated primary emergency authority.

15.A. 40 CFR 265.52(e) as referenced by 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility's contingency plan does not include a list of all emergency equipment (such as fire extinguishing systems, spill control equipment, communications and alarm systems (internal and external), and decontamination equipment), nor does it include the location and a physical description of each item on the list, and a brief outline of its capabilities.

16.A. 40 CFR 265.54(d) as referenced by 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility did not review and immediately amend the contingency plan when the list of emergency coordinators changed due to personnel changes. The plan is dated 10-16-97, and the date on the List of Emergency Phone Numbers is 10-9-97.

17.A. 40 CFR 265.16(d)(3) as referenced by 40 CFR 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility did not have a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management.

18.A. 40 CFR 265.16(d)(1) as referenced by 40 CFR 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility did not maintain records that include the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job.

19.A. 40 CFR 265.16(d)(2) as referenced by 40 CFR 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility did not maintain a written job description for each position related to hazardous waste management that includes requisite skill, education, or other qualifications, and duties of facility personnel assigned to each position related to hazardous waste management.

20.A. 40 CFR 265.16 (d)(4) as referenced by 40 CFR 262.34(a)(4) as referenced by 33 CSR 20-5.1

B. The facility did not have records that document that the training or job experience required under 265.16 (a), (b), and (c) have been given to, and completed by, facility personnel.

In order to attain compliance with the cited Code and/or Regulations, you must perform the following remedial actions:

1. Upon receipt of this notice, ensure that all containers holding hazardous waste are kept closed except when adding or removing waste from the container.
2. Upon receipt of this notice, ensure that all containers holding hazardous are marked with the accumulation start date.
3. Upon receipt of this notice, ensure that all containers holding hazardous are marked with the words "Hazardous Waste".
4. Within 30 days of receipt of this notice, cease storage of hazardous waste for greater than 90 days. Ensure solids are removed from the 8000 tank and all 55 gallon containers are shipped off-site every ninety days to maintain compliance, unless a permit is obtained for storage.
5. Upon receipt of this notice, establish and maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment through out the facility (including the drum storage area).

6. Upon receipt of this notice, mark all containers accumulating hazardous waste in the satellite accumulation areas with the words hazardous waste or other words which identify the contents.
7. Upon receipt of this notice, cease on site disposal of hazardous waste. Ensure hazardous waste is not placed in trash only barrels.
8. Within 30 days of receipt of this notice, perform hazardous waste determinations in accordance with 40 CFR 262.11 on all solid wastes generated at the facility.
9. Within 60 days of receipt of this notice, provide overfill protection controls on the 300 gallon stainless steel sump tank.
10. Upon receipt of this notice, remove spilled or leaked waste and accumulated precipitation from the secondary containment system, thereafter monitor and remove liquids within 24 hours of discovery.
11. Within 60 days of receipt of this notice, revise the contingency plan in accordance with 40 CFR Part 265.52(d); 265.52(c); 265.37(a)(2); 265.52(e); and 265.54(d).
12. Within 60 days of receipt of this notice, complete a written description of the type and amount of both introductory and continuing training that will be given to each person filling a position at the facility related to hazardous waste management, there after maintain this record in accordance with 40 CFR 265.16(d)(3).
13. Within 60 days of receipt of this notice, make a list of job titles for each position at the facility related to hazardous waste management and the name of the employee filling each job thereafter maintain this document in accordance with 40 CFR 265.13(d)(1).
14. Within 60 days of receipt of this notice, complete a written job description for each position related to hazardous waste management that includes requisite skill, education, or other qualification, and duties of facility personnel assigned to each position related to hazardous waste management.
15. Within 60 days of receipt of this notice, document the training or job experience required under 265.16(a), (b),(c) have been given to, and completed by, facility personnel in accordance with 40 CFR 265.16 (d)(4).
16. Upon of receipt of this notice, maintain and operate the facility to minimize the possibility of a release of hazardous waste or hazardous waste constituents to air, soil, or surface water.
17. Within 90 days of receipt of this notice, provide documentation that the actions necessary to return to compliance have been completed.

A copy of this Notice of Violation will be forwarded to the Enforcement Unit of the Office of Waste Management. The issuance of this Notice may result in an administrative civil penalty being levied in accordance with West Virginia Code §22-18-17.

District Phone: (304) 367-2724 Issued By: Joyce Moore

District Fax: (304) 367-2727 Title: Environmental Inspector

Attachment A

Office of Air Quality
1558 Washington Street, East
Charleston, WV 25311
Telephone Number: (304) 558-0885
Fax Number: (304) 558-1222

West Virginia Division of Environmental Protection

Cecil H. Underwood
Governor

Michael C. Castle
Director

INSPECTION FACT SHEET

COMPANY NAME: Bombardier Aerospace, West Virginia Air Center
EPA ID #: WVD988776852

PLANT ID #: 033-00132
PERMIT #: No Reg. 25 Permit.

MAILING ADDRESS: 2400 Aviation Way
Bridgeport, WV 26330

FACILITY TYPE: Subpart CC, < 90 Day Drum Storage and Tanks

LOCATION: Bridgeport Airport, 5 miles east off I-79 Bridgeport/ Clarksburg Exit
COUNTY: Harrison
REGION: 6

COMPANY CONTACT: Mr. William Polling
PHONE: (304) 842-6300

PURPOSE: Compliance Evaluation
APPLICABLE REGS: 45CSR25, 40 CFR 265 Subparts CC

DATE INSPECTED: August 24, 1999
INSPECTORS: Jon McClung and Brandon Miller

DATE PREPARED: September 15, 1999
PREPARED BY: Brandon Miller
REVIEWED BY: Lucy Pontiveros

FACILITY STATUS CODE: 10, Not in compliance
VIOLATIONS: 45CSR25-4.6, 40CFR265 1085 (b),

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INSPECTION MEMORANDUM

DIVISION OF ENVIRONMENTAL PROTECTION

West Virginia Office of Air Quality

Company:	Bombardier Aerospace			Facility:	West Virginia Air Center - Bridgeport
Region:	6	Plant ID#:	033-00132	Regulations:	45CSR25, 40CFR265 Subpart CC
Inspected By: Brandon Miller				Title: EIT II	
Memo Date: September 15, 1999				Inspection Date: August 24, 1999	

INTRODUCTION

On August 24, 1999, an unannounced inspection of the operations at Bombardier's West Virginia Air Center, located in Bridegeport, was conducted. The inspection was performed by Jon McClung and Brandon Miller of the Office of Air Quality. The purpose of the inspection was to check for compliance with RCRA Subparts AA, BB and CC. The facility escort for the inspection was Mr. Bill Pulling, Environmental, Health, and Safety Manager. The inspection lasted approximately 2 hours and consisted of a visual inspection of the work areas, waste storage areas, review of the waste analysis performed, and a closing meeting.

PROCESS DESCRIPTION

West Virginia Air Center performs maintenance on small to medium sized commercial airplanes. The type of maintenance performed includes engine overhauls, parts replacement and checks, and painting. The main focus of the inspection was on the paint stripping operation which is performed in only one of the maintenance bays. The WV Air Center strips paint off of airplanes by applying formic acid to an area on the plane and allowing it to sit. Over time, the formic acid will strip the paint off of the plain at which time the paint and acid wastes are allowed to drop onto the floor as it is being scraped off. This waste is then washed into a drain with water were the waste mixture is gravity feed into a sump. The sump consists of a 300 gallon steel tank that is placed underground in a concrete lined pit that is approximately six feet by four feet by ten feet deep. When the waste reaches a certain level in the tank it is then pumped to a 8,000 gallon "Stripper Water" Tank. This tank is located inside of the bay where the paint is removed. The wastes are held in the Stripper Water Tank for less than 90 days, at which time tank trucks remove the wastes for disposal off-site. The rest of the facility is comprised of maintenance areas that do not perform paint stripping.

OPERATING CONDITIONS

NON-CONFIDENTIAL

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The first area inspected revealed that hazardous waste satellite accumulation drums were being left with the lids cracked between 1/2" to 1". Some of the satellite accumulation drums had pools of liquid on top of the lids. This would likely cause a spill of the hazardous waste onto the floor the next time that the lids were removed. Next, the bay where the paint is stripped from the airplanes was inspected, since this is were the less than 90 day storage area is located. The drums that could be inspected appeared to be in good condition with the lids in place and less than 90 day accumulation dates. However, the drums were being placed so that they were six or seven deep and seven across with the drums all pushed up against the corner of the building's wall. Also, there was other obstacles that effectively blocked access to the majority of the drums. This made it impossible to ascertain the condition of the drums, the contents of the drums, and the dates of accumulation for any of the drums except those seven that were in the front.

The sump area where the acid and paint wastes drain was examined next. As the three steel doors that cover the sump were removed, a strong, pungent odor was noticed by the inspectors. The concrete pit (secondary containment) had what appeared to be approximately 50 gallons of the hazardous waste contained. Running through the concrete secondary containment was approximately a 12 inch line that had a three inch leg that could dump into the secondary containment. The 12 inch line also had a large valve connected just before it exited the secondary containment. When asked the purpose of the large line, valve, and leg, the OAQ was informed that the 12 inch line connects to another maintenance bay which had previously also been used to perform paint stripping but now has been converted to only maintenance. The wastes from that now converted paint stripping bay were then allowed to travel through the 12 inch line to the leg and into the secondary containment of the current paint stripping bay. The OAQ was assured that the connection to the old paint stripping bay that had been converted had a closed valve in the line so that no wastes from the converted bay could flow into the current stripper water sump secondary containment. The reason for the 12 inch line entering the secondary containment had been explained but no the purpose of the valve or the fact that the 12 inch line also exited the secondary containment. The valve had been closed to prevent any of the hazardous waste from entering into the city sewer system, which is what the 12 inch line ties into. It was also noted that the three steel plates used to cover the opening of the sump area had what appeared to be a rubber gasket in place. This gasket was in very poor condition and would likely not prevent the release of any vapors.

Next, the inspectors observed the 8,000 gallon Stripper Water Tank. The question was asked if a waste determination had ever been performed on the stripper water and Mr. Pulling told us that he thought that he had that information in his office. The tank appeared to be in good condition with no signs of leaks. The tank was clearly labeled hazardous waste. One item of concern was that a vent was noticed on the tank. This vent traveled just outside of the work area where it was allowed to vent freely to the atmosphere. The inspection next focused on the old paint stripping bay that had been converted to a maintenance only bay. There was a satellite accumulation area in this bay that had more drums with liquids pooled on the top of the lids. When asked where the wastes would go if someone opened a lid and the liquid was spilled, Bombardier officials acknowledged that the floor drains in that maintenance bay are connected to the city sewer system. The inspectors then made copies of the waste analysis performed on the stripper water dated January 29, 1999. The waste analysis showed that no organics had been detected. However, it was determined at that time to be inadequate for the purposes of Subpart CC, with notes in the analysis saying that the detection limit

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was in excess of the regulated limit.

CONCLUSIONS

A request for a new waste analysis was made at the time of the closing meeting with Mr. Pulling, since it appears that the analysis performed (reported February 16, 1999) was inadequate. On September 13, 1999, a letter was received from Bombardier. The letter states that an analysis of the waste sampled on February 28, 1999, and reported March 10, 1999, did show the concentrations of organics in the stripper water to be at 1400 ppm, 1200 ppm, and 1200 ppm, from three samples of the hazardous waste that were taken. These samples were analyzed using EPA Method 25D. Moreover, the information sent to the OAQ from Bombardier included a MSDS for the solution used to remove the paint from the airplanes. While the solution does have formic acid (4-7%) as Bombardier had informed the OAQ, it also contains d-limonene (<5%), benzyl alcohol (15-20%), and benzyl formate (5-10%). All of this means that the 8,000 gallon Stripper Water Tank and the sump would be regulated by Subpart CC. Since the 8,000 gallon Stripper Water Tank was observed to have no emissions control device the company is in violation of 40CFR265.1085(b).

The facility has known or should have known that the stripper water is in fact an organic hazardous waste since March 10, 1999. Bombardier has continued operation of the hazardous waste storage system and at the time of the inspection did not appear to be in the process of upgrading any of their system so that it would be in compliance with 45CSR25 and 40CFR265. Also during the inspection, a number of potential violations of 40CFR265 were noticed that fell outside of 45CSR25 (40CFR265 Subparts AA, BB, and CC), which was the focus of this particular inspection. These concerns included hazardous waste stored in the secondary containment, floor drain lines that are connected to the city sewer (some valves closed and some without valves at all), aisle space requirements, hazardous waste on top of the satellite accumulation drums, and open satellite accumulation drums. Joyce Moore and John Hando of the Office of Waste Management (OWM) branch located in Fairmont have been notified of the observations made during the inspection. At several points throughout the inspection, Mr. Pulling indicated that he would like to make changes to the way hazardous wastes were being handled. For example he mentioned that he had looked for a device to limit the emissions from the tank but could not find one, that he had wanted to move the less than 90 day storage outside of the working area, and that he knew that the drains connecting to the city water was not a good idea. He had also admitted that he had been hired within the last five months and that changes were not occurring as quickly as he would have liked. A joint OWM and OAQ inspection would be in order within the next month due to the nature and number of potential problems and likely RCRA violations both from OAQ and OWM.

Brandon Miller
EIT II

September 15, 1999

NON-CONFIDENTIAL

Attachment B

USED OIL MANIFEST
(Non-Hazardous)

Petroleum Recyclers and Environmental Services, Inc.

3 PRINGLE TREE ROAD • BUCKHANNON, WV 26201 • 304-472-5806
E.P.A. I.D. # WVR000000554 • BUS. LIC. # 55-0756964

26131

ACCT. #

DATE OF SERVICE 11-30-99

DRIVER'S SIGNATURE

COMPANY AND LOCATION	BILLING ADDRESS
WEST VIRGINIA AIR CENTER	
2400 AVIATION WAY	
BRIDGEPORT, WV 26330	

CONTACT	PHONE NO.	SERVICE TERM:
TIM COTTREL/DAVE TURNER	304-842-6300	2 WEEKS
TIME OF SERVICE	**NEXT SERVICE**	**TANK SIZE**
12:00		TANK TRUCK

WASTE DESCRIPTION	STARTING INCHES	ENDING INCHES	NET GAL/CPS	UNIT PRICE	TOTAL
~~USED~~ FOR RECYCLING off-Spec Fuel			490 gal	N/C	
OILY WATER FOR DISPOSAL					
USED ANTIFREEZE FOR RECYCLING					
OIL FILTER - DRUM - REMOVED					
HOURLY PUMP TRUCK CHARGE					
Last Serviced 11/5/99					
~~Contract Expires~~					
OFF-SPEC FUEL					
SEE TIM OR DAVE BEFORE PUMPING					
TANK MONITOR SERVICE				TOTAL	
TANK/OIL TESTED FOR CONTAMINATION YES___ NO___ P.P.M.___				TAX	
TANK TESTED FOR WATER, ANTIFREEZE CONTAMINATION YES___ NO___ #OF GAL.___				**TOTAL**	

P.R.E.S.. RECEIVABLES

PAYMENT RECEIVED YES (NO)

AMOUNT RECEIVED ___

CHECK NO. ___

DATE RECEIVED ___

TO BE BILLED? YES (NO)

P.O. # ___

REMARKS:

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. INVOICES REFLECTING CHARGES TO CUSTOMER ARE SUBJECT TO AN INTEREST RATE OF THE LESSER OF 1 1/2% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY INVOICES THAT ARE NOT PAID WITHIN 30 DAYS. IN THE EVENT OF DEFAULT, PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC. SHALL BE ENTITLED TO RECOVER COSTS OF COLLECTION, INCLUDING REASONABLE ATTORNEY'S FEES. GENERATOR WARRANTS AND REPRESENTS THAT THE MATERIALS PROVIDED PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC., HEREUNDER HAVE NOT BEEN MIXED, COMBINED, OR OTHERWISE BLENDED IN ANY QUANTITY WITH MATERIALS CONTAINING POLYCHLORINATED BIPHENYLS (PCB) OR ANY OTHER MATERIAL DEFINED AS A HAZARDOUS WASTE UNDER APPLICABLE LAWS, INCLUDING BUT NOT LIMITED TO 40 CFR PART261. GENERATOR AGREES TO INDEMNIFY AND HOLD PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC., HARMLESS FOR ANY DAMAGES, COSTS, ATTORNEY'S FEES, ETC. ARISING OUT OF OR IN ANY WAY RELATED TO A BREACH OF THE ABOVE WARRANTY BY THE GENERATOR.

X David O Turner

GENERATOR/CUSTOMER SIGNATURE

B-2

Petroleum Recyclers and Environmental Services, Inc.

3 PRINGLE TREE ROAD • BUCKHANNON, WV 26201 • 304-472-5806
E.P.A. I.D. # WVR000000554 • BUS. LIC. # 55-0756964

USED OIL MANIFEST
(Non-Hazardous)

25892

ACCT. #

DATE OF SERVICE 11-5-99

DRIVER'S SIGNATURE Mitch Wood

COMPANY AND LOCATION	BILLING ADDRESS
WEST VIRGINIA AIR CENTER	
2400 AVIATION WAY	
BRIDGEPORT, WV 26330	

CONTACT	PHONE NO.	SERVICE TERM:
TIME OF SERVICE TIM COTTREL/DAVE TURNER	NEXT SERVICE ~~304-842-6300~~	TANK SIZE ~~Call In~~ TANK TRUCK

WASTE DESCRIPTION	STARTING INCHES	ENDING INCHES	NET GAL/CPS	UNIT PRICE	TOTAL
USED OIL FOR RECYCLING			500 gal	N/C	
OILY WATER FOR DISPOSAL					
USED ANTIFREEZE FOR RECYCLING					
OIL FILTER - DRUM - REMOVED					
HOURLY PUMP TRUCK CHARGE					
10/14/99 Contract Expires					
~~SEE TIM OR DAVE BEFORE PUMPING~~					
TANK MONITOR SERVICE				TOTAL	
TANK/OIL TESTED FOR CONTAMINATION YES___ NO___ P.P.M.___				TAX	
TANK TESTED FOR WATER, ANTIFREEZE CONTAMINATION YES___ NO___ #OF GAL.___				TOTAL	

P.R.E.S.. RECEIVABLES

PAYMENT RECEIVED YES (NO)

AMOUNT RECEIVED ___

CHECK NO. ___

DATE RECEIVED ___

TO BE BILLED? YES (NO)

P.O. # ___

REMARKS:

CHARGE MY ACCOUNT FOR THIS TRANSACTION UNLESS OTHERWISE INDICATED IN THE PAYMENT RECEIVED SECTION. INVOICES REFLECTING CHARGES TO CUSTOMER ARE SUBJECT TO AN INTEREST RATE OF THE LESSER OF 1 1/2% PER MONTH (18% PER ANNUM) OR THE MAXIMUM RATE ALLOWED BY LAW ON ANY INVOICES THAT ARE NOT PAID WITHIN 30 DAYS. IN THE EVENT OF DEFAULT, PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC. SHALL BE ENTITLED TO RECOVER COSTS OF COLLECTION, INCLUDING REASONABLE ATTORNEY'S FEES. GENERATOR WARRANTS AND REPRESENTS THAT THE MATERIALS PROVIDED PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC., HEREUNDER HAVE NOT BEEN MIXED, COMBINED, OR OTHERWISE BLENDED IN ANY QUANTITY WITH MATERIALS CONTAINING POLYCHLORINATED BIPHENYLS (PCB) OR ANY OTHER MATERIAL DEFINED AS A HAZARDOUS WASTE UNDER APPLICABLE LAWS, INCLUDING BUT NOT LIMITED TO 40 CFR PART261. GENERATOR AGREES TO INDEMNIFY AND HOLD PETROLEUM RECYCLERS AND ENVIRONMENTAL SERVICES, INC., HARMLESS FOR ANY DAMAGES, COSTS, ATTORNEY'S FEES, ETC. ARISING OUT OF OR IN ANY WAY RELATED TO A BREACH OF THE ABOVE WARRANTY BY THE GENERATOR.

X David O Turner
GENERATOR/CUSTOMER SIGNATURE

September 29, 1995

Attachment C

USA and WORLDWIDE

Material Safety Data Sheet

PHILJET® A AVIATION FUEL with PFA 56

PHILLIPS 66 COMPANY
A Division of Phillips Petroleum Company
Bartlesville, Oklahoma 74004

PHONE NUMBERS
Emergency: (918) 661-8118
General MSDS Information: (918) 661-5355
For Additional MSDSs: (918) 661-3709

A. Product Identification

Synonyms: Aviation Turbine Fuel A with PFA 56; Kerosine Turbine Fuel with PFA 56; Kerosine
Chemical Name: Mixture
Chemical Family: Hydrocarbon
Chemical Formula: Mixture
CAS Reg. No.: Mixture
Product No.: 30293

Product and/or Components Entered on EPA's TSCA Inventory: YES

This product is in U.S. commerce, and is listed in the Toxic Substances Control Act (TSCA) Inventory of Chemicals; hence, it may be subject to applicable TSCA provisions and restrictions.

B. Components

Ingredients	CAS Number	% By Wt.	OSHA PEL	ACGIH TLV
Kerosene, may include	8008-20-6	100	NE	NE
Paraffinic hydrocarbons	Various	> 50	NE	NE
includes, n-Octane	111-65-9	> 1	300 ppm	300 ppm
n-Nonane	111-84-2	> 3	200 ppm	200 ppm
Naphthenes	Various	< 33	NE	NE
Aromatic hydrocarbons	Various	< 17	NE	NE
includes, Benzene	71-43-2	< 0.8	1 ppm*	10 ppm
Toluene	108-88-3	< 1	100 ppm	50 ppm
p-Xylene	106-42-3	< 1	100 ppm	100 ppm
m-Xylene	108-38-3	< 3	100 ppm	100 ppm
o-Xylene	95-47-6	< 1.4	100 ppm	100 ppm
1,3,5-Trimethylbenzene	108-67-8	< 1.4	25 ppm**	25 ppm**
1,2,4-Trimethylbenzene	95-63-6	< 3.8	25 ppm**	25 ppm**
1,2,3-Trimethylbenzene	526-73-8	< 1.0	25 ppm**	25 ppm**
Sulfur compounds	Various	< 0.3	NE	NE
PFA 56	111-77-3	< 0.1	NE	NE

* Operations exempted by the Benzene Standard, 29 CFR 1910.1028, will have a 10 ppm 8 hour TWA.
** As trimethylbenzene.

NA - Not Applicable NE - Not Established

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C. Personal Protection Information

Ventilation: Use adequate ventilation to control below recommended exposure levels.

Respiratory Protection: For concentrations exceeding the recommended exposure level, use NIOSH/MSHA approved air purifying respirator. In case of spill or leak resulting in unknown concentration, use NIOSH/MSHA approved supplied air respirator. If conditions immediately dangerous to life or health (IDLH) exist, use NIOSH/MSHA approved self-contained breathing apparatus (SCBA).

Eye Protection: Use safety glasses with side shields. For splash protection wear chemical goggles and face shield.

Skin Protection: Use protective garments to prevent skin contact. Use neoprene or nitrile gloves.

NOTE: Personal protection information shown in Section C is based upon general information as to normal uses and conditions. Where special or unusual uses or conditions exist, it is suggested that the expert assistance of an industrial hygienist or other qualified professional be sought.

D. Handling and Storage Precautions

Do not get in eyes, on skin or on clothing. Do not breathe vapors, mist, fume or dust. Do not swallow, may be aspirated into lungs. Wear protective equipment and/or garments described in Section C if exposure conditions warrant. Wash thoroughly after handling. Immediately remove and launder contaminated clothing before reuse. Use only with adequate ventilation.

Keep away from heat, sparks and flame. Store in well-ventilated area. Bond and ground during transfer. Store in closed container.

E. Reactivity Data

Stability: Stable
Conditions to Avoid: Not Applicable
Incompatibility (Materials to Avoid): Oxygen and strong oxidizing agents

Hazardous Polymerization: Will Not Occur
Conditions to Avoid: Not Applicable
Hazardous Decomposition Products: Carbon oxides and various hydrocarbons formed when burned.

F. Health Hazard Data

Recommended Exposure Limits:

See Section B.

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Acute Effects of Overexposure:

Eye: Vapors may cause slight irritation. Liquid may cause intense stinging without long term effects.

Skin: Repeated skin contact may cause severe skin irritation.

Inhalation: May cause headache, nausea and sedation.

Ingestion: May be irritating to intestines. If swallowed, may be aspirated resulting in inflammation and possible fluid accumulation in the lungs.

Subchronic and Chronic Effects of Overexposure:

Kerosene generally contains benzene which has been designated a carcinogen by the National Toxicology Program (NTP), the International Agency for Research on Cancer (IARC), and the Occupational Safety and Health Administration (OSHA). Benzene may produce blood changes which include reduced platelets, red blood cells, and white blood cells; also aplastic anemia, and acute nonlymphatic leukemia. Benzene has produced fetal death in laboratory animals and caused chromosome changes in humans and mutation changes in cells of other organisms. Health effects attributable to benzene are not known to occur in humans exposed to kerosene.

Kerosene has caused kidney injury in male rats only. No comparable health hazard for kidney disease is known to occur in humans.

Exposure of pregnant rats during gestation to toluene at levels of 250 ppm and higher produces some maternal toxicity and embryo/fetotoxicity. A lifetime inhalation study in rats did not show any toxic effects even at the high dose of 300 ppm. Behavioral signs of hearing loss were observed in rats exposed to toluene subchronically at levels of 1000 ppm or more. Comparable effects have not been reported in humans.

Liver and kidney changes have been noted in long term studies in animals exposed to xylenes. Fetotoxicity has been observed in animals with subchronic exposure to mixed xylenes at concentrations approximately five times the permissible exposure limit.

An epidemiology study of workers exposed to two isomers of trimethylbenzene had symptoms of nervousness, tension and anxiety, and asthmatic bronchitis. In addition, after inhalation of 60 ppm measured as hydrocarbon vapor, the workers' peripheral blood showed a tendency to hypochromic anemia and a deviation from normal in the coagulability of the blood.

Other Health Effects:

Combustion (burning) of most carbon-containing material forms carbon monoxide. Carbon monoxide inhalation may cause carboxyhemoglobinemia. Chronic exposure to carbon monoxide causes fatigue, poor memory, loss of sensation in fingers, visual disturbances and insomnia. Carboxyhemoglobinemia is frequently misdiagnosed as flu.

Sensitive sub-populations to the inhalation of carbon monoxide exist. Carbon monoxide displaces oxygen in the bloodstream and therefore, can adversely effect people with pre-existing heart disease, pregnant women and smokers.

Health Hazard Categories:

	Animal	Human		Animal	Human
Known Carcinogen	_X_	_X_	Toxic	___	___
Suspect Carcinogen	___	___	Corrosive	___	___
Mutagen	_X_	___	Irritant	_X_	_X_
Teratogen	_X_	___	Target Organ Toxin	_X_	_X_
Allergic Sensitizer	___	___			
Highly Toxic	___	___			

Specify - Lungs-Aspiration Hazard; Blood, Liver and Kidney Toxin; Reproductive Toxin-Embryo/Fetotoxin

First Aid and Emergency Procedures:

Eye: Flush eyes with running water for at least fifteen minutes. If irritation or adverse symptoms develop, seek medical attention.

Skin: Immediately wash skin with soap and water for at least fifteen minutes. If irritation or adverse symptoms develop, seek medical attention.

Inhalation: Remove from exposure. If breathing is difficult, give oxygen. If breathing ceases, administer artificial respiration followed by oxygen. Seek immediate medical attention.

Ingestion: Do not induce vomiting. Seek immediate medical attention.

Note to Physician: Gastric lavage using a cuffed endotracheal tube may be performed at your discretion.

G. Physical Data

Appearance:	Colorless Liquid
Odor:	Mild
Boiling Point:	300-372F (149-300C)
Vapor Pressure:	<1
Vapor Density (Air = 1):	Not Established
Solubility in Water:	Negligible
Specific Gravity (H20 = 1):	0.775-0.840
Percent Volatile by Volume:	100
Evaporation Rate (Ethyl Ether = 1):	<1
Viscosity:	8 cSt @ -4F (-20C)

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H. Fire and Explosion Data

Flash Point (Method Used):	100-150F (38-66C)(TCC, ASTM D-56)
Flammable Limits (% by Volume in Air):	LEL - Not Established UEL - Not Established
Fire Extinguishing Media:	Dry chemical, foam or carbon dioxide (CO2)
Special Fire Fighting Procedures:	Evacuate area of all unnecessary personnel. Shut off source, if possible. Use NIOSH/MSHA approved self-contained breathing apparatus (SCBA) and other protective equipment and/or garments described in Section C if conditions warrant. Water fog or spray may be used to cool exposed containers and equipment. Do not spray water directly on fire - product will float and could be reignited on surface of water.
Fire and Explosion Hazards:	Carbon oxides and various hydrocarbons formed when burned. Combustible vapors may accumulate and flash or explode if in contact with ignition source.

I. Spill, Leak and Disposal Procedures

Precautions Required if Material is Released or Spilled:
Evacuate area of all unnecessary personnel. Wear protective equipment and/or garments described in Section C if exposure conditions warrant. Shut off source, if possible and contain spill. Protect from ignition. Keep out of water sources and sewers. Absorb in a dry, inert material (sand, clay, etc). Transfer to disposal drums using non-sparking equipment.

Waste Disposal (Insure Conformity with all Applicable Disposal Regulations):
Incinerate or place in permitted waste management facility.

J. DOT Transportation

Shipping Name:	Fuel, aviation, turbine engine
Hazard Class:	3 (Flammable liquid)
ID Number:	UN 1863
Packing Group:	III
Marking:	Fuel, aviation, turbine engine, UN 1863
Label:	Flammable liquid
Placard:	Flammable/1863
Hazardous Substance/RQ:	Not Applicable
Shipping Description:	Fuel, aviation, turbine engine, 3 (Flammable liquid), UN 1863, PG III
Packaging References:	49 CFR 173.150, 173.203, 173.241

NOTE: This product may be reclassed as a combustible liquid when shipped domestically, by land only. If reclassed as a combustible liquid, this product is unregulated by DOT when shipped in non-bulk quantities.

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K. RCRA Classification - Unadulterated Product as a Waste

Ignitable (D001)

Prior to disposal, consult your environmental contact to determine if TCLP (Toxicity Characteristic Leaching Procedure, EPA Test Method 1311) is required. Reference 40 CFR Part 261.

L. Protection Required for Work on Contaminated Equipment

Contact immediate supervisor for specific instructions before work is initiated. Wear protective equipment and/or garments described in Section C if exposure conditions warrant.

M. Hazard Classification

_X_ This product meets the following hazard definition(s) as defined by the Occupational Safety and Health Hazard Communication Standard (29 CFR Section 1910.1200):

_X_ Combustible Liquid	___ Flammable Aerosol	___ Oxidizer
___ Compressed Gas	___ Explosive	___ Pyrophoric
___ Flammable Gas	_X_ Health Hazard (Section F)	___ Unstable
___ Flammable Liquid	___ Organic Peroxide	___ Water Reactive
___ Flammable Solid		

___ Based on information presently available, this product does not meet any of the hazard definitions of 29 CFR Section 1910.1200.

N. Additional Comments

SARA 313

This product contains the following chemical or chemicals subject to the reporting requirements of Section 313 of Title III of the Superfund Amendments and Reauthorization Act of 1986 and 40 CFR Part 372. (See Section B).

Benzene
Toluene
p-Xylene
o-Xylene
m-Xylene
1,2,4-Trimethylbenzene

NFPA 704 Hazard Codes - - - - - - - - -	Signals
	Least - 0
Health : 2	Slight - 1
Flammability: 2	Moderate - 2
Reactivity : 0	High - 3
Special Haz.: -	Extreme - 4

Attachment D

Emergency Contact Telephone Number

UNIFORM HAZARDOUS WASTE MANIFEST

1. Generator's US EPA ID No. W.V.D.9.8.8.7.7.6.8.5.2 | Manifest Document No. 0.0.1.8.5 | 2. Page 1 of 1 | Information in the shaded areas is not required by Federal law.

3. Generator's Name and Mailing Address: West Virginia Air Center, Bendum Airport, PO Drawer 340, Bridgeport, WV 26330

4. Generator's Phone (304 842-6300

A. State Manifest Document Number

B. State Generator's ID: Same

5. Transporter 1 Company Name: Dart Trucking Co., Inc. | 6. US EPA ID Number: O H D 0 0 9 8 6 5 8 2 5

C. State Transporter's ID

D. Transporter's Phone: 330/533-9841

7. Transporter 2 Company Name: Chemical Conservation Corp | 8. US EPA ID Number: FL.D980.559.728

E. State Transporter's ID

F. Transporter's Phone: 407/859-444

9. Designated Facility Name and Site Address: Chemical Conservation of Georgia, Inc., 1612 James P. Rodgers Circle, Valdosta, GA 31601 | 10. US EPA ID Number: G A D 0 9 3 3 8 0 8 1 4

G. State Facility's ID

H. Facility's Phone: 912/244-0474

	11. US DOT Description (Including Proper Shipping Name, Hazard Class, and ID Number)	HM	12. Containers No.	12. Containers Type	13. Total Quantity	14. Unit Wt/Vol	I. Waste No.
a.	RQ, Waste Flammable Liquid, N.O.S., 3, UN1993, I (Methyl Ethyl Ketone, Acetone Oil) (D001, D035, F003, F005)	X	004	DM	002220	G	F003 F005
b.	RQ, Waste Flammable Liquid, N.O.S., 3, UN1993, III (Oil, Jet Fuel)	X	006	DM	003330	G	D018 D001
c.	RQ, Hazardous Waste Solid, N.O.S., 9, NA3077, III (Methyl Ethyl Ketone, Acetone) (D035, F003, F005)	X	017	DM	009935	G	F003 F005
d.							

J. Additional Descriptions for Materials Listed Above
A. App# WESG7485 also D001, D035 ERG#128
B. App# WESG9666 ERG#128
C. App# WESG6919 also D035 ERG#171

K. Handling Codes for Wastes Listed Above

15. Special Handling Instructions and Additional Information
Emergency Contact: Capitol Environmental Services, Inc. (800) 560-2374

16. GENERATOR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by proper shipping name and are classified, packed, marked, and labeled, and are in all respects in proper condition for transport by highway according to applicable international and national governmental regulations.

If I am a large quantity generator, I certify that I have a program in place to reduce the volume and toxicity of waste generated to the degree I have determined to be economically practicable and that I have selected the practicable method of treatment, storage, or disposal currently available to me which minimized the present and future threat to human health and the environment; OR, if I am a small quantity generator, I have made a good faith effort to minimize my waste generation and select the best waste management method that is available to me and that I can afford.

GENERATOR

Printed/Typed Name: Robert Wright | Signature: Robert Wright | Month Day Year: 12 30 99

TRANSPORTER

17. Transporter 1 Acknowledgement of Receipt of Materials

Printed/Typed Name: Paul Lasky | Signature: Paul Lasky | Month Day Year: 12 30 99

18. Transporter 2 Acknowledgement of Receipt of Materials

Printed/Typed Name: Jacob Allen Agent For | Signature: Jacob Allen | Month Day Year: 01 10 00

FACILITY

19. Discrepancy Indication Space

20. Facility Owner or Operator: Certification of receipt of hazardous materials covered by this manifest except as noted in Item 19.

Printed/Typed Name: Charlotte Dorminey | Signature: Charlotte Dorminey | Month Day Year: 01 10 00

ORIGINAL — RETURN TO GENERATOR

D-2

CHEMICAL CONSERVATION CORPORATION · CHEM-MET SERVICES, INC. · CHEMICAL CONSERVATION OF GEORGIA, INC.

SUBPART CC AND LAND DISPOSAL RESTRICTION NOTIFICATION/CERTIFICATION FORM

Generator Name: WEST VIRGINIA AIR CENTER Manifest No.: 00185 Page 1 of 3

Note: Spaces in boxes correspond to line items in the manifest and identify wastes described in it in the following order [a|b|c|d]

SUBPART CC PART — Indicate whether wastes on the manifest are regulated under Subpart CC for containing VOCs in concentration levels equal or greater than 500 ppmw by entering a "Y" for "yes" or an "N" for "no" as appropriate in the boxes [Y|Y|Y|]

LAND DISPOSAL RESTRICTION PART — COMPLETE THIS FIRST [| | | |] These wastes are Wastewater [A|B|C] These wastes are Non-Wastewater

SECTION 1. THE WASTES REFERENCED IN THIS SECTION DO NOT MEET LAND DISPOSAL RESTRICTIONS

MLI	CODE	SUBCATEGORY/CONSTITUENT
		A. RCRA Characteristic Wastes
A	D001	Ignitable Liquids (TOC>10%)
B	D001*	Other Ignitables (TOC<10%)
	D002*	Corrosive Wastes
	D003*	Other Reactives [261.23(a)(1)]
	D003*	Water Reactives [261.23(a)(2)-(4)]
	D003	Reactive Cyanides [261.23(a)(5)]
	D003	Reactive Sulfides [261.23(a)(5)]
	D003*	Explosives [261.23(a)(6) and (7)]
	D004	Arsenic
	D005	Barium
	D006	Cadmium
	D006	Cadmium containing batteries
	D007	Chromium
	D008	Lead
	D008	Lead containing batteries
	D009	Low (<260 kg/mg) Mercury
	D009	High (>260) Mercury w/organics
	D009	High Mercury without organics
	D009	Mercury wastewaters
	D010	Selenium
	D011	Silver
	D012*	Endrin
	D013*	Lindane
	D014*	Methoxychlor
	D015*	Toxaphene
	D016*	2,4-D
	D017*	2,4,5-TP(Silvex)
B	D018*	Benzene
	D019*	Carbon tetrachloride
	D020*	Chlordane

MLI	CODE	CONSTITUENT
	D021*	Chlorobenzene
	D022*	Chloroform
	D023*	o-Cresol
	D024*	m-Cresol
	D025*	p-Cresol
	D026*	Cresol (Total)
	D027*	p-Dichlorobenzene
	D028*	1,2-Dichloroethane
	D029*	1,1-Dichloroethylene
	D030*	2,4-Dinitrotoluene
	D031*	Heptachlor
	D032*	Hexachlorobenzene
	D033*	Hexachlorobutadiene
	D034*	Hexachloroethane
A C	D035*	Methyl ethyl ketone
	D036*	Nitrobenzene
	D037*	Pentachlorophenol
	D038*	Pyridine
	D039*	Tetrachloroethylene
	D040*	Trichloroethylene
	D041*	2,4,5-Trichlorophenol
	D042*	2,4,6-Trichlorophenol
	D043*	Vinyl chloride
		B. California List Wastes
		Nickel
		Thallium
		Liquids with PCB's
		Waste with HOC's>1000ppm

Does the waste identified by an asterisk (*) contains any Underlying Hazardous Constituents per 268.7(a)(1) ? YES [X] NO [ ] .If YES, please complete and attach a Universal Treatment Standard (UTS) form as per 268.48

MLI	CODE	C. RCRA Listed Wastes
	F001	Select one or more constituents below for every F001-F005 code selected here
	F002	
A C	F003	
	F004	
A C	F005	
A C		Acetone
		Benzene
		n-Butyl alcohol
		Carbon disulfide
		Carbon tetrachloride
		Chlorobenzene
		o,m,p- Cresols
		Cyclohexanone
		o-Dichlorobenzene
		Ethyl acetate
		Ethylbenzene
		Ethyl ether
		Isobutanol
		Methanol
		Methylene chloride
A C		Methyl ethyl ketone
		Methyl isobutyl ketone
		Nitrobenzene
		Pyridine
		Tetrachloroethylene
		Toluene
		1,1,1-Trichloroethane
		1,1,2-Trichloroethane
		1,1,2-Trichloro-1,2,2-Triflu...
		Trichloroethylene
		Trichloromonofluoromethane
		Xylene(s) (total)
		2-Ethoxyethanol
		2-Nitropropane
		Chlorinated fluorocarbon

D. Other RCRA Listed Wastes (for codes not listed above)

MLI	LIST ALL WASTE CODES - ENTER SUBCATEGORY IN PARENTHESIS AFTER WASTE CODE, IF APPLICABLE

I certify that I have personally examined and I am familiar with the waste through analysis, testing or knowledge of the waste to support the information provided in this form.

SIGN Print Name: X ROBERT WRIGHT Sign: X [signature] Date: X 12-30-99

SECTION 2. THE WASTES REFERENCED IN THIS SECTION MEET LAND DISPOSAL RESTRICTIONS

MLI	LIST CODES, EACH FOLLOWED BY CONFORMING CONSTITUENTS IN PARENTHESIS - ENTER "ALL" WHEN ALL MEET TREATMENT STDS

I certify under penalty of law that I have personally examined and I am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA Section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

GENERATOR FILE COPY

SIGN Print Name: _____ Sign: _____ Date: _____

07/29/97

D-3

Chemical Conservation Corp. Chem-Met Services, Inc. Chemical Conservation of Georgia, Inc.

UNIVERSAL TREATMENT STANDARDS(UTS)/UNDERLYING HAZARDOUS CONSTITUENTS(UHC) FORM

Generator Name: WEST VIRGINIA AIR CENTER Manifest No: 00185 Page: 1 of 2

List all constituents on both pages of this document that are present in D001(except for TOC≥ 10%), D002, D003# and D012-D043 waste streams in concentrations above the stated levels. The regulatory levels are in total concentrations, unless noted with an asterick.
(# Explosive, water reactive and other reactive only) (WW: Wastewater, NWW: Non-Wastewater)
Insert the manifest line identifier (MLI) in the boxes to the left of the constituents. If using this form in association with a profile, place an X in the box next to the appropriate constituents.

MLI		WW	NWW
	A2213	0.042	1.4
	Acenaphthene	0.059	3.4
	Acenaphthylene	0.059	3.4
	Acetone	0.28	160
	Acetonitrile	5.6	38
	Acetophenone	0.01	9.7
	2-Acetylaminofluorene	0.059	140
	Acrolein	0.29	N/A
	Acrylamide	19	23
	Acrylonitrile	0.24	84
	Aldicarb sulfone @	0.056	0.28
	Aldrin	0.021	0.066
	4-Aminobiphenyl	0.13	N/A
	Aniline	0.81	14
	Anthracene	0.059	3.4
	Aramite	0.36	N/A
	Barban @	0.056	1.4
	Bendiocarb @	0.056	1.4
	Bendiocarb phenol @	0.056	1.4
	Benomyl @	0.056	1.4
	Benz (a) anthracene	0.059	3.4
	Benzal Chloride	0.055	6
B	Benzene	0.14	(10)
	Benzo (b) fluoranthene	0.11	6.8
	Benzo (k) fluoranthene	0.11	6.8
	Benzo (g,h,i) perylene	0.0055	1.8
	Benzo (a) pyrene	0.061	3.4
	alpha-BHC	0.00014	0.066
	beta-BHC	0.00014	0.066
	delta-BHC	0.023	0.066
	gamma-BHC (Lindane)	0.0017	0.066
	Bromodichloromethane	0.35	15
	Bromomethane (Methyl bromide)	0.11	15
	4-Bromophenyl phenyl ether	0.055	15
	n-Butyl alcohol	5.6	2.6
	Butyl benzyl phthalate	0.017	28
	Butylate @	0.042	1.4
	2-sec-Butyl 4,6-dinitrophenol (Dinoseb)	0.066	2.5
	Carbaryl @	0.006	0.14
	Carbenzadim @	0.056	1.4
	Carbofuran @	0.006	0.14
	Carbofuran phenol @	0.056	1.4
	Carbon disulfide	3.8	4.8*
	Carbon tetrachloride	0.057	6
	Carbosulfan @	0.028	1.4
	Chlordane(alpha & gamma)	0.0033	0.26
	p-Chloroaniline	0.46	16
	Chlorobenzene	0.057	6
	Chlorobenzilate	0.1	N/A
	2-Chloro-1,3-butadiene	0.057	0.28
	Chlorodibromomethane	0.057	15
	Chloroethane	0.27	6
	bis-(2-Chloroethoxy)methane	0.036	7.2
	bis-(2-Chloroethyl)ether	0.033	6
	2-Chloroethyl vinyl ether	0.062	N/A
	Chloroform	0.046	6
	bis-(2-Chloroisopropyl)ether	0.055	7.2
	p-Chloro-m-cresol	0.018	14
	Chloromethane (Methyl chloride)	0.19	30
	2-Chloronaphthalene	0.055	5.6
	2-Chlorophenol	0.044	5.7
	3-Chloropropylene	0.036	30
	Chrysene	0.059	3.4
	o-Cresol	0.11	5.6
	Cresol (m-or p-isomers)	0.77	5.6

MLI		WW	NWW
	m-Cumenyl methylcarbamate @	0.056	1.4
	Cyclohexanone	0.36	0.75*
	o,p'- DDD	0.023	0.087
	p,p'- DDD	0.023	0.087
	o,p'- DDE	0.031	0.087
	p,p'- DDE	0.031	0.087
	o,p'- DDT	0.0039	0.087
	p,p'- DDT	0.0039	0.087
	Dibenz(a,h)anthracene	0.055	8.2
	Dibenz(a,e)pyrene	0.061	N/A
	1,2-Dibromo-3-chloropropane	0.11	15
	1,2- Dibromoethane (Ethylene dibromide)	0.028	15
	Dibromomethane	0.11	15
	m-Dichlorobenzene	0.036	6
	o- Dichlorobenzene	0.088	6
	p- Dichlorobenzene	0.09	6
	Dichlorodifluoromethane	0.23	7.2
	1,1- Dichloroethane	0.059	6
	1,2- Dichloroethane	0.21	6
	1,1- Dichloroethylene	0.025	6
	trans-1,2- Dichloroethylene	0.054	30
	2,4- Dichlorophenol	0.044	14
	2,6- Dichlorophenol	0.044	14
	2,4-Dichorophenoxyacetic acid (2,4-D)	0.72	10
	1,2- Dichloropropane	0.85	18
	cis-1,3-Dichloropropylene	0.036	18
	trans-1,3-Dichloropropylene	0.036	18
	Dieldrin	0.017	0.13
	Diethyl phthalate	0.2	28
	Diethylene glycol, dicarbamate @	0.056	1.4
	p-Dimethylaminoazobenzene	0.13	N/A
	2,4-Dimethyl phenol	0.036	14
	Dimethyl phthalate	0.047	28
	Dimetilan @	0.056	1.4
	Di-n-butyl phthalate	0.057	28
	1,4-Dinitrobenzene	0.32	2.3
	4,6-Dinitro-o-cresol	0.28	160
	2,4- Dinitrophenol	0.12	160
	2,4-Dinitrotoluene	0.32	140
	2,6-Dinitrotoluene	0.55	28
	Di-n-octyl phthalate	0.017	28
	Di-n-propylnitrosamine	0.4	14
	1,4-Dioxane	12	170
	Diphenylamine	0.92	13
	Diphenylnitrosamine	0.92	13
	1,2- Diphenylhydrazine	0.087	N/A
	Disulfoton	0.017	6.2
	Dithiocarbamates (total) @	0.028	28
	Endosulfan I	0.023	0.066
	Endosulfan II	0.029	0.13
	Endosulfan sulfate	0.029	0.13
	Endrin	0.0028	0.13
	Endrin aldehyde	0.025	0.13
	EPTC @	0.042	1.4
	Ethyl acetate	0.34	33
	Ethyl benzene	0.057	10
	Ethyl cyanide (Propanenitrile)	0.24	360
	Ethyl ether	0.12	160
	Ethyl methacrylate	0.14	160
	Ethylene oxide	0.12	N/A
	bis(2-Ethylhexyl) phthalate	0.28	28
	Famphur	0.017	15
	Fluoranthene	0.068	3.4
	Fluorene	0.059	3.4

Chemical Conservation Corp. Chem-Met Services, Inc. Chemical Conservation of Georgia, Inc.

UNVERSAL TREATMENT STANDARDS(UTS)/UNDERLYING HAZARDOUS CONSTITUENTS(UHC) FORM

Generator Name: WEST VIRGINIA AIR CENTER Manifest No: 00185

MLI	Constituent	WW	NWW
	Formetanate hydrochloride @	0.056	1.4
	Formparanate @	0.056	1.4
	Heptachlor	0.0012	0.066
	Heptachlor epoxide	0.016	0.066
	Hexachlorobenzene	0.055	10
	Hexachlorobutadiene	0.055	5.6
	Hexachlorocyclopentadiene	0.057	2.4
	Hexachloroethane	0.055	30
	Hexachloropropylene	0.035	30
	HxCDDs(All Hexachlorodibenzo-p-dioxins)	0.000063	0.001
	HxCDFs(All Hexachlorodibenzofurans)	0.000063	0.001
	Indeno (1,2,3-c,d) pyrene	0.0055	3.4
	Iodomethane	0.19	65
	Isobutyl alcohol	5.6	170
	Isodrin	0.021	0.066
	Isolan @	0.056	1.4
	Isosafrole	0.081	2.6
	Kepone	0.0011	0.13
	Methacrylonitrile	0.24	84
	Methanol	5.6	0.75*
	Methapyrilene	0.081	1.5
	Methiocarb	0.056	1.4
	Methomyl	0.028	0.14
	Methoxychlor	0.25	0.18
A C	Methyl ethyl ketone	0.28	(36)
	Methyl isobutyl ketone	0.14	33
	Methyl methacrylate	0.14	160
	Methyl methansulfonate	0.018	N/A
	Methyl parathion	0.014	4.6
	3-Methylcholanthrene	0.0055	15
	4,4-Methylene bis(2-chloroaniline)	0.5	30
	Methylene chloride	0.089	30
	Metolcarb @	0.056	1.4
	Mexacarbate @	0.056	1.4
	Molinate @	0.042	1.4
	Napthalene	0.059	5.6
	2-Naphthylamine	0.52	N/A
	o-Nitroaniline	0.27	14
	p-Nitroaniline	0.028	28
	Nitrobenzene	0.068	14
	5-Nitro-o-toluidine	0.32	28
	o-Nitrophenol	0.028	13
	p-Nitrophenol	0.12	29
	N-Nitrosodiethylamine	0.4	28
	N-Nitrosodimethylamine	0.4	2.3
	N-Nitroso-di-n-butylamine	0.4	17
	N-Nitrosomethylethylamine	0.4	2.3
	N-Nitrosomorpholine	0.4	2.3
	N-Nitrosopiperidine	0.013	35
	N-Nitrosopyrrolidine	0.013	35
	Oxamyl	0.056	0.28
	Parathion	0.014	4.6
	Total PCBs	0.1	10
	Pebulate @	0.042	1.4
	Pentachlorobenzene	0.055	10
	PeCDDs (All Pentachlorodibenzo-p-dioxins)	0.000063	0.001
	PeCDFs(All Pentachlorodibenzofurans)	0.000035	0.001
	Pentachloroethane	0.055	6
	Pentachloronitrobenzene	0.055	4.8
	Pentachlorophenol	0.089	7.4
	Phenacetin	0.081	16
	Phenanthrene	0.059	5.6
	Phenol	0.039	6.2
	o-Phenylenediamine @	0.056	5.6
	Phorate	0.021	4.6
	Phthalic acid	0.055	28
	Phthalic anhydride	0.055	28

MLI	Constituent	WW	NWW
	Physostigmine @	0.056	1.4
	Physostigmine salicylate @	0.056	1.4
	Promecarb @	0.056	1.4
	Pronamide	0.093	1.5
	Propham @	0.056	1.4
	Propoxur @	0.056	1.4
	Prosulfocarb @	0.042	1.4
	Pyrene	0.067	8.2
	Pyridine	0.014	16
	Safrole	0.081	22
	Silvex (2,4,5-TP)	0.72	7.9
	1,2,4,5-Tetrachlorobenzene	0.055	14
	TCDDs (All Tetrachlorodibenzo-p-dioxins)	0.000063	0.001
	TCDFs (All Tetrachlorodibenzofurans)	0.000063	0.001
	1,1,1,2-Tetrachloroethane	0.057	6
	1,1,2,2-Tetrachloroethane	0.057	6
	Tetrachloroethylene	0.056	6
	2,3,4,6-Tetrachlorophenol	0.03	7.4
	Thiodicarb @	0.019	1.4
	Thiophanate-methyl @	0.056	1.4
	Tirpate @	0.056	0.28
	Toluene	0.08	10
	Toxaphene	0.0095	2.6
	Triallate @	0.042	1.4
	Tribromomethane (Bromoform)	0.63	15
	1,2,4-Trichlorobenzene	0.055	19
	1,1,1-Trichlorethane	0.054	6
	1,1,2- Trichloroethane	0.054	6
	Trichloroethylene	0.054	6
	Trichloromonofluoromethane	0.02	30
	2,4,5-Trichlorophenol	0.18	7.4
	2,4,6-Trichlorophenol	0.035	7.4
	2,4,5-Trichlorophenoxyacetic acid(2,4,5-T)	0.72	7.9
	1,2,3-Trichloropropane	0.85	30
	1,1,2-Trichloro-1,2,2-trifluoroethane	0.057	30
	Triethylamine @	0.081	1.5
	tris-(2,3-Dibromopropyl) phosphate	0.11	0.1
	Vernolate @	0.042	1.4
	Vinyl chloride	0.27	6
	Xylene(s)	0.32	30
	Cyanides (Total)	1.2	590
	Cyanides (Amenable)	0.86	30
	Fluoride**	35	N/A
	Sulfide	14	N/A
	Antimony	1.9	2.1*
	Arsenic	1.4	5.0*
	Barium	1.2	7.6*
	Beryllium	0.82	0.014*
	Cadmium	0.69	0.19*
	Chromium (Total)	2.77	0.86*
	Lead	0.69	0.37*
	Mercury (Nonwastewater from Retort)	N/A	0.20*
	Mercury (All others)	0.15	0.025*
	Nickel	3.98	5.0*
	Selenium	0.82	0.16*
	Silver	0.43	0.30*
	Thallium	1.4	0.078*
	Vanadium**	4.3	0.23*
	Zinc**	2.61	5.3*

** Not UHC in characertistic wastes (268.2(i)). * TCLP Values

Do the waste stream(s) identified on the manifest listed above or on the attached profile contain any of the constituents listed on this table in concentrations above the regulatory levels?

@ Between 8/26/96 and 8/26/97 these constituents are not UHCs.

☐ YES ☐ NO

Signature: [signature] Date: 12-30-99

Company: Title:

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1			Container Information									Special Requipments								Hangar											
2	Waste Stream Name	Waste Stream Number	Hazardous Status	Container Type	Outer Container	Size (Gal)	Container Top	Materials Storage	Color Code Tape	Approved Materials	Next Step	Flammable Cabinet	Flammable Funnel	Drain Funnel	Level-Lock Rings	Equipment	2nd Containment	Signage	Bonding & Ground	Bay 1 & 2	Battery Shop	Internal Shop	Composite Shop	Sheet Metal Shop	Bay 3	Bay 4	Stores	Paint Mixing Room	GSE	Facility	Line Mntc
3	Alodine & Etch Rags	101	Yes	Plastic	1H2	55	Open	Solid	Black/White Stripe	All Alodine, Turco #5664 (WO 1), No Free Flowing Liquid	N/A				X					X				X	X	X					
4	Waste Oil	102	No	Steel	1A1	55	Closed	Liquid	Black/Yellow Stripe	Motor Oil, All Hydraulic Fluids, Greases, No Solvents, No Water, (Small Amounts of Jet A)	N/A			X			X			X						X			X		X
5	Aerosol Cans Punched	103	Yes	Steel	1A1	55	Closed	Liquid	Red/White Stripe	All Aerosols	1.) Puncher Can 2.) Allow to drain contains 3.) Dispose of can in regular trash or metal recycle	X				X			X	X						X					
6	Aerosol Cans Not-Punched	103 B	Yes	Steel	1H2	20	Open	solid	Red/White stripe	All Aerosols	The whole can is disposed of in this waste stream	X			X																X
7	Filter Crusher	None								All fuel, motor, & hydraulic filter	1.) Empty the oil collection container into WS 102 2.) Disposal of Crushed filters into WS 104 (Maybe able to recycle)			X		X				X						X					
8	Waste Filter	104	Regulated	Steel	1A2	30	Open	Solid	Green/White Stripe	Crushed or whole filters	Crushed filter maybe recycled				X					X						X					X
9	Waste Antifreeze	105	No	Steel	1A1	55	Closed	Liquid	Red/White Checkboard	Antifreeze & Deicing Fluid				X			X												X		
10	Waste O2 Generators (Expended)	106	Yes	Steel	1H2	30	Open	Solid	Black/White Checkboard		After discharged unit and cooled, it can be then placed in this waste stream drum				X			"No Oil Products to be Stored in this Area"									X				
11	Waste Paint Solid/Debris	107	Yes	Steel	1A2	55	Open	Solid	Red Solid	Paints/adhesives/apoxies sealants and items that contain. Like gloves, paper, mixing cups, tubes of sest, sanding dust, NEPA filters, etc.		X			X					X		X	X		X	X		X			X

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1			Container Information									Special Requipments								Hangar											
2	Waste Stream Name	Waste Stream Number	Hazardous Status	Container Type	Outer Container	Size (Gal)	Container Top	Materials Storage	Color Code Tape	Approved Materials	Next Step	Flammable Cabinet	Flammable Funnel	Drain Funnel	Level-Lock Rings	Equipment	2nd Containment	Signage	Bonding & Ground	Bay 1 & 2	Battery Shop	Internal Shop	Composite Shop	Sheet Metal Shop	Bay 3	Bay 4	Stores	Paint Mixing Room	GSE	Facility	Line Mntc
12	Waste Paint Liquid	108	Yes	Steel	1A1	55	Closed	Liquid	Magenta/Yellow Striped	- Liquid left over from a paint job -Solvent used to clean equipment or paint guns -No SOLIDS		X	X						X	X		X	X		X			X			
13	Waste Nickel Cadmium Cells	109	Yes	Plastic	1H2	55	Open	Solid							X		X				X										
14	Waste Nickel Cadmium Wash	110	Yes	Plastic	1H1	55	Closed	Liquid	Blue Solid	All wash and rince water form battery or cell washing				X			X				X										
15	Waste Oil Cans	111	No	Steel	1A1	5	Closed	Liquid		1.) Cut can top off 2.) Drain oil can for 24 hrs (NO FREEFLOWING LIQUID) 3.) Disposal can in regular trash (or Recycle) 4.) Oil collected goes in WS102						X		"Cut Can tops off and then drain"			X					X					X
16	Waste Absorbent	112	Yes	Steel	1A2	55	Open	Solid	White Solid	Pig Mats, Kit Litter					X					X					X				X		X
17	RCRA Empty Drums	113	Yes							Drums/pales that materials come in can be reused if are DOT condition. If not in DOT condition, then the drum is sent off-site as RCRA empty.	The drum must be storage on container side and all bungs must in place to ensure rain water does not enter the container																		X			X
18	Waste Beads	114	Yes	Steel	1A2	55	Open	Solid	Green Solid	1.) Waste Bead Blaster 2.) Materials sweep-up from around the blaster. 3.) Material from HEPA vacuum cleaner. 4.) Paint sanding					X						X											
19	Waste Florescence Lamps	115	Yes	Fiberboard Drum	1G	30", 48", & 95"		Solid		Building Lamps Aircraft Lamps								"Lamps can NOT be Broken"		X					X				X		
20	Used Aircraft Tires	116	No								Document the transaction. Must maintain prove that item was not disposed of in the regular trash.																X					X

Bombardier Aerospace
Waste Management Program
Waste Stream Summary

E-3

	A	B	C	D	E	F	G	H	I	J	K	L	M	N	O	P	Q	R	S	T	U	V	W	X	Y	Z	AA	AB	AC	AD	AE
1			Container Information									Special Requipments								Hangar											
2	Waste Stream Name	Waste Stream Number	Hazardous Status	Container Type	Outer Container	Size (Gal)	Container Top	Materials Storage	Color Code Tape	Approved Materials	Next Step	Flammable Cabinet	Flammable Funnel	Drain Funnel	Level-Lock Rings	Equipment	2nd Containment	Signage	Bonding & Ground	Bay 1 & 2	Battery Shop	Internal Shop	Composite Shop	Sheet Metal Shop	Bay 3	Bay 4	Stores	Paint Mixing Room	G3E	Facility	Line Mntc
21	Waste Car/GSE Tires	117	No								Document the transaction. Must maintain prove that item was not disposed of in the regular trash.																			X	X
22	Lead Acid Batteries	118	No							Batteries must be recycles (Cord Charge)	Document the transaction. Must maintain prove that item was not disposed of in the regular trash.																			X	X
23	Waste Cartidges, Power Devices	119	No							Explosive Bolt Squibs	Explode devise and then dispose of in regular trash					X															
24	Regular Trash	120	No	Steel	N/A	55	Open	Solid	Container Painted Solid Green	Non-hazardous Waste						X		"# of Non-Hazardous Waste Only"		6	1	2	1	2	6	2	2	1	1	1	x
25	Kitty Litter	121	No	Steel	N/A	55	Open	Solid	Container Painted Solid Blue	This container is to provide a reusable way to dispense kitty litter.	When this material is spent it is added to WS 112					X		"No Sanding Dust" "No Solvent"		2				2	2				2		x
26	Stripping Tank Soilds	122	Yes	Tank		2000		Solid	None	All the solids from cleaning the Stripping Tank															X						
27	Stripping Water	123	Yes	Tank		8000		Liquid	None	All the liquids from the Bay 3 Painting operation															X						

PRATT & LAMBERT 316-733-1361
Industrial Coatings Div.
P.O. Box 2153
Wichita, KS 67201

DOT EMERGENCY CHEMTEL (800)255-3924 (24hrs)
INFORMATION PHONE NO. 316-733-1361 (M-F 8 AM-5 PM CT)

CORPORATE CONTACT 716-873-6000 (M-F 8 AM-5 PM CT)

H.M.I.S.	
HEALTH	2
FLAMMABILITY	3
REACTIVITY	0

These ratings should be used only as part of fully implemented H.M.I.S. program.

MATERIAL SAFETY DATA SHEET

SECTION I

PRODUCT CLASS SOLVENT BLEND DATE OF PREPARATION 1/22/96

TRADE NAME JET GLO-ACRYGLO BEST MEDIUM THINNER MR 60-85 F

MANUFACTURER CODE I.D. 110701 18

SECTION II - HAZARDOUS INGREDIENTS

INGREDIENT	% BY WGT	CAS NO.	ALLOWABLE EXPOSURE LEVEL	PPM	MG/CU.M.	MPPCF	SARA 313	VP mm Hg @ 20 DEG.C
TOLUENE	10	108-88-3	TLV-TWA	50	147		SKIN X	22
			OSHA-PEL	100	375			
			OSHA-STEL	150	560			
			LFL 1.7		UFL 7.1			
ETHYL ACETATE	15	141-78-6	TLV-TWA	400	1400			73
			OSHA-PEL	400	1400			
			LFL 2.0		UFL 11.0			
ETHYL ALCOHOL	5	64-17-5	TLV-TWA	1000	1900			44
			OSHA-PEL	1000	1900			
			LFL 3.0		UFL 19.0			
CYCLOHEXANONE	10	108-94-1	TLV-TWA	25	100		SKIN	2
			OSHA-PEL	25	100		SKIN	
			LFL 1.1					
PROPYLENE GLYCOL METHYL ETHER ACETATE	55	108-65-6	NONE ESTABLISHED					2
DIPROPYLENE GLYCOL METHYL ETHER ACETATE	5	88917-22-0	NONE ESTABLISHED					

LFL = LOWER FLAMMABILITY LIMIT PERCENT
UFL = UPPER FLAMMABILITY LIMIT PERCENT
SKIN = SKIN ABSORPTION MUST BE CONSIDERED AS A ROUTE OF EXPOSURE
C-CEILING= ALLOW. EXPOSURE LEVEL SHOULD NOT BE EXCEEDED FOR ANY TIME PERIOD
MFR = MANUFACTURER RECOMMENDED EXPOSURE LIMIT
STEL = SHORT TERM EXPOSURE LIMIT
X-SARA 313 = CHEMICAL IS SUBJECT TO REPORTING REQUIREMENTS OF SECTION 313 OF TITLE III OF S.A.R.A. 40 CFR PART 372

SECTION III - HEALTH INFORMATION

EFFECTS OF SHORT TERM OVEREXPOSURE

SWALLOWING
Can cause gastrointestinal irritation, nausea, and vomiting. Aspiration of material into lung may cause chemical pneumonitis which can be fatal.

INHALATION
May cause nose or throat irritation. High concentrations may cause acute central nervous system depression characterized by headache, dizziness, nausea and confusion.

EYE
May cause severe eye irritation.

SKIN
Liquid material may be absorbed through the skin in harmful amounts. May cause severe skin irritation.

EFFECTS OF REPEATED OVEREXPOSURE
Repeated overexposure to toluene may cause liver damage. Reports have associated prolonged and repeated occupational overexposure to solvents with permanent brain and nervous system damage. Intentional misuse by deliberately concentrating and inhaling the contents may be harmful or fatal.

SIGNIFICANT LABORATORY DATA WITH POSSIBLE RELEVANCE TO HUMAN HEALTH.
Toluene has been found to cause kidney, lung and spleen damage in laboratory animals.

SECTION IV - FIRST AID AND EMERGENCY PROCEDURES

SWALLOWING
If swallowed do not induce vomiting. Call poison control center, hospital emergency room or physician immediately.

INHALATION
Remove to fresh air immediately. If breathing has stopped, give artifi-

SECTION IV — FIRST AID AND EMERGENCY PROCEDURES (CONTINUED)

INHALATION
cial respiration. Keep warm and quiet. Get medical attention immediately.

EYE
Flush with large amounts of water, lifting upper and lower lids occasionally. Continue for at least 15 minutes. Get medical attention.

SKIN
Immediately flush the contaminated area with large amounts of water. Remove contaminated clothing as water is applied. Consult a physician.

NOTES TO PHYSICIAN
Any treatment that might be required for overexposure should be directed at the control of symptoms and the clinical conditions.

SECTION V — PHYSICAL DATA

BOILING RANGE 167 DEG.F. (75 DEG.C.) TO 408 DEG.F.(209 DEG.C.)

VAPOR DENSITY Heavier than air. % VOLATILE BY VOLUME 100

EVAPORATION RATE Slower than diethyl ether. VOC 7.85 lb/gal less water & NRS* 942 g/l less water CALCULATED

WEIGHT LB./GAL. 7.8 SPECIFIC GRAVITY 0.9 VOC .00 lb/gal solids 0 g/l solids CALCULATED

All Physical data determined at 68 DEG. F. (20 DEG. C.) 760 mm Hg
* Negligibly Photochemically Reactive Materials
VOC values reported here are verified by ASTM method D-3960

SECTION VI — FIRE AND EXPLOSION DATA

NFPA FLAMMABILITY CLASSIFICATION FLAMMABLE LIQUID - CLASS IB

FLASHPOINT 24 DEG.F, (-4 DEG.C,) CALCULATED

EXTINGUISHING MEDIA
Use NFPA Class B fire extinguishers (carbon dioxide, all purpose dry chemical or alcohol foam) designed to extinguish flammable liquid fires. Polymer foam is preferred for large fires.

UNUSUAL FIRE AND EXPLOSION HAZARDS
During emergency conditions, overexposure to decomposition products may cause a health hazard. Symptoms may not be immediately apparent. obtain medical attention.
WARNING! FLAMMABLE.

SPECIAL FIRE FIGHTING PROCEDURES
Water may be ineffective, but may be used to cool exposed containers to prevent pressure build-up and possible auto-ignition or explosion when exposed to extreme heat. If water is used, fog nozzles are preferable.

SECTION VII — REACTIVITY DATA

STABILITY
Normally stable.
CONDITIONS TO AVOID
Avoid excessive heat (>115 F (46 C) and sources of ignition.
INCOMPATABILITY (MATERIALS TO AVOID)
Strong acids or alkaline materials.
Acetyl chloride.
HAZARDOUS DECOMPOSITION PRODUCTS
Burning, including when heated by welding or cutting, will produce smoke, carbon monoxide and carbon dioxide.
HAZARDOUS POLYMERIZATION
Will not occur
CONDITIONS TO AVOID
None known

SECTION VIII — ENVIRONMENTAL INFORMATION

STEPS TO BE TAKEN IF MATERIAL IS RELEASED OR SPILLED
Keep spectators away. Eliminate all ignition sources (flames, hot surfaces, and sources of electrical, static or frictional sparks). Dike and contain spill with inert material (e.g. sand, earth). Transfer liquids to covered metal containers for recovery or disposal, or remove with inert absorbent. Use only non-sparking tools. Place absorbent diking materials in covered metal containers for disposal. Prevent contamination of sewers, streams, and groundwater with spilled material or used absorbent.
WASTE DISPOSAL
Dispose in accordance with federal, state and local regulations.
RCRA CLASSIFICATION
This product, if discarded directly, would be classified a hazardous waste based on its ignitability characteristic, i.e. has a flash point of 140 deg. F.(60 deg.C) or less. The proper RCRA classification would be D001.
ENVIRONMENTAL HAZARDS
None known

SECTION IX — PERSONAL PROTECTION INFORMATION

RESPIRATORY PROTECTION
Proper selection of respiratory protection depends upon many factors

SECTION VII - PERSONAL PROTECTION INFORMATION (CONTINUED)

RESPIRATORY PROTECTION
including duration/level of exposure and conditions of use. In general exposure to organic chemicals such as those contained in this product may not require the use of respiratory protection if used in well ventilated areas. In restricted ventilation areas a NIOSH approved chemical cartridge respirator may be required. Under certain conditions, such as spraying, a mechanical prefilter may also be required. In confined areas use a NIOSH/MSHA approved air supplied respirator. If the TLV's listed in Section II are exceeded use a properly fitted NIOSH/MSHA approved respirator with an appropriate protection factor. Refer to OSHA 29 CFR 1910.134 "Respiratory Protection" and "Respiratory Protection A Manual And Guideline, American Industrial Hygiene Assoc."

VENTILATION
Provide local exhaust ventilation in sufficient volume and pattern so as to maintain exposures below nuisance dust limits and permissible exposure limits which may be listed in Section II. Refer to Industrial Ventilation - A Manual for Recommended Practice - American Conference of Governmental Industrial Hygienists.

HAND PROTECTION
Solvent impermeable gloves are required for repeated or prolonged contact.

EYE PROTECTION
Wear safety spectacles.

OTHER PROTECTIVE EQUIPMENT
Eyewash facility, safety shower.

SECTION IX - SPECIAL PRECAUTIONS

PRECAUTIONS TO BE TAKEN IN HANDLING AND STORAGE
Do not store above 115 deg.f (46 deg.C) store large quantities in compliance with OSHA 29CFR1910.106.

OTHER PRECAUTIONS
Do not take internally. Close container after each use.
Empty containers must not be washed and re-used for any purpose.
Containers should be grounded and bonded to the receiving container.
Do not weld, braze or cut on empty container.
Never use pressure to empty. Drum is not a pressure vessel.

SECTION XI - OTHER INFORMATION

THE INFORMATION CONTAINED HEREIN IS BASED ON DATA CONSIDERED TO BE ACCURATE. WHILE THE INFORMATION IS BELIEVED TO BE RELIABLE, NO WARRANTY IS EXPRESSED OR IMPLIED REGARDING THE ACCURACY OF THIS DATA OR THE RESULTS TO BE OBTAINED FROM THE USE THEREOF. SINCE THE USE OF THIS INFORMATION AND THE CONDITIONS AND USE OF THIS PRODUCT ARE CONTROLLED BY THE USER, IT IS THE USER'S OBLIGATION TO DETERMINE THE CONDITIONS OF SAFE USE OF THE PRODUCT.
The Corporate Safety and Environmental Affairs Department is responsible for the preparation of this Material Safety Data Sheet.

DOWNTOWN AIRPARK
1701 SOUTH WESTERN
OKLAHOMA CITY OK
73109

Date Printed 03/19/99

Chemical Waste Management, Inc.

GENERATOR'S WASTE PROFILE SHEET

Profile # VIC AC3174

(_) Check here if this is a Recertification LOCATION OF ORIGINAL Waste Management of Ohio, Inc.

Attachment G

GENERAL INFORMATION

1. Generator Name: WEST VIRGINIA AIR CENTER Generator USEPA ID: WVD988776852
2. Generator Address: BENEDUM AIRPORT Billing Address: (_) Same BANTAM ENVIRONMENTAL
   PO BOX 198
   BRIDGEPORT WV 26330 BRANDAMORE PA 19316
3. Technical Contact/Phone: BILL PULLING 304/842-6300
4. Alternate Contact/Phone: Billing Contact/Phone: STUART POLLOCK 610/942-9021

PROPERTIES AND COMPOSITION

5. Process Generating Waste: Stripper Water
6. Waste Name: Waste Water
7. A. Is this a USEPA hazardous waste (40 CFR Part 261)? Yes (X) No (_)
   B. Identify ALL USEPA listed and characteristic waste code numbers (D,F,K,P,U): D002 D006 D007 D008
   State Waste Codes: Same as USEPA Codes
8. Physical State @ 70F: A. Solid(_) Liquid(X) Both(_) Gas(_) B. Single Layer (X) Multilayer (_) C. Free liq. range 98 to 100%
9. A. pH: Range 2.1 to 14.0 or Not applicable (_) B. Strong Odor (_);describe
10. Liquid Flash Point: < 73F (_) 73-99F (_) 100-139F (_) 140-199F (_) >= 200F (X) N.A. (_) Closed Cup (X) Open Cup (_)
11. CHEMICAL COMPOSITION: List ALL constituents (incl. halogenated organics) present in any concentration and forward analysis

Constituents	Range		Unit	Description
WATER	99 to	100	%	
FORMIC ACID	0 to	2	%	
CHROMIUM	25 to	150	PPM	
LEAD	5 to	15	PPM	
CADMIUM	1 to	6	PPM	
	to			
TOTAL COMPOSITION (MUST EQUAL OR EXCEED 100%):		102.000000		

12. OTHER: PCBs if yes, concentration _ ppm, PCBs regulated by 40 CFR 761 (_). Pyrophoric (_) Explosive (_) Radioactive (_) Benzene if yes, concentration _ ppm. NESHAP (N) Shock Sensitive (_) Oxidizer (_) Carcinogen (X) Infectious (_) Other
13. If waste subject to the land ban & meets treatment standards, check here: _ & supply analytical results where applicable.

SHIPPING INFORMATION

14. PACKAGING: Bulk Solid (_) Bulk Liquid (X) Drum (_) Type/Size: TANK Other
15. ANTICIPATED ANNUAL VOLUME: 80000 Units: GALLONS Shipping Frequency: QUARTERLY

SAMPLING INFORMATION

Sample Tracking Number: 4525760

16a. Sample source (drum, lagoon, pond, tank, vat, etc.):
Date Sampled: Sampler's Name/Company:
16b. Generator's Agent Supervising Sampling: 17. (X) No sample required (See instructions.)

GENERATOR'S CERTIFICATION

I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize CWM to obtain a sample from any waste shipment for purposes of recertification.

Signature on original profile AC3174 ALICE YBARREGO ADM. SAFETY&ENV. 9/16/98

Signature Name and Title Date

Date Printed 03/19/99

Profile # VIC AC1174

G-2

18. This is a Nonwastewater.

19. If this waste is subject to any California list restrictions enter the letter from below (either A, B.1 or B.2) next to each restriction that is applicable:
___ HOCs, ___ PCBs, ___ Acid, A Metals, ___ Cyanides

20. Identify ALL Characteristic and Listed USEPA hazardous waste numbers that apply (as defined by 40 CFR 261). For each waste number, identify the subcategory (as applicable, check none, or write in the description from 40 CFR 268.41, 268.42, and 268.43).

REP #	A. US EPA HAZARDOUS WASTE CODE(S)	B. SUBCATEGORY Enter the subcategory description. If not applicable, simply check none		C. APPLICABLE TREATMENT STANDARDS			D. HOW MUST THE WASTE BE MANAGED? Enter letter from below
				PERFORMANCE-BASED: Check as applicable		SPECIFIED TECHNOLOGY: If applicable enter the 40 CFR 268.42 table 1 treatment code(s)	
		DESCRIPTION	NONE	268.41(a)	268.43(a)	268.42	
1	D002	CWA or Class I managed corrosive char. wastes				DEACT	A
2	D006		X	X			A
3	D007		X	X			A
4	D008		X	X			A
5							
6							
7							
8							
9							
10							

Management under the land disposal restrictions:
A. RESTRICTED WASTE REQUIRES TREATMENT

B.1 RESTRICTED WASTE TREATED TO PERFORMANCE STANDARDS

B.2 RESTRICTED WASTES FOR WHICH THE TREATMENT STANDARD IS EXPRESSED AS A SPECIFIED TECHNOLOGY (AND THE WASTE HAS BEEN TREATED BY THAT TECHNOLOGY)

B.3 GOOD FAITH ANALYTICAL CERTIFICATION FOR INCINERATED ORGANICS

C. RESTRICTED WASTE SUBJECT TO A VARIANCE

D. RESTRICTED WASTE CAN BE LAND DISPOSED WITHOUT FURTHER TREATMENT

E. NOT CURRENTLY SUBJECT TO LAND DISPOSAL RESTRICTIONS

21. Is this waste a soil or debris? No: X Yes, Soil: _ Yes, Debris: _

22. Specific Gravity Range: 1.000 to 1.200

23. Indicate the range of each: Units

Cyanides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

Cyanides: _ None to _____ _____ Type (free, total, amenable, etc.) _____

Sulfides: _ None to _____ _____ Type _____

Optional Phenolics: _ None to _____ _____

24. Identify the waste color _____, DOT physical state Liquid,

and physical appearance SINGLE LAYER LOW VISCOSITY

Date Printed 03/19/99

Profile # VIC AC3174 G-3

25. COMPLETE ONLY FOR WASTES INTENDED FOR *FUELS OR INCINERATION*

	TOTAL	
Beryllium as Be		ppm
Potassium as K		ppm
Sodium as Na		ppm
Bromine as Br		%
Chlorine as Cl		%
Fluorine as F		%
Sulfur as S		%

26. RECLAMATION, FUELS or INCINERATION PARAMETERS (Provide if information is available)

RANGE

A. Heat Value (Btu/lb): ____-____

B. Water: _____

C. Viscosity (cps): ____@____F _ 100 F _ 150 F

D. Ash: _____ %

E. Settleable solids: _____ %

F. Vapor Pressure @ STP (mm/Hg): ____

G. Is this waste a pumpable liquid? Yes _ No _

H. Can this waste be heated to improve flow? Yes _ No _

I. Is this waste soluble in water? Yes _ No _

J. Particle size: Will the solid portion of this waste pass through a 1/8 inch screen? Yes _ No _

27. TRANSPORTATION INFORMATION

A. Is this a DOT Hazardous Material? Yes X No _

B. Proper Shipping Name. . . . . .: RQ, HAZARDOUS WASTE, LIQUID, N.O.S

and Additional Description if required: RQ (D006, D007, D008)

C. DOT Regulations: North America Hazard Class: 9 Misc.Hazardous Mat'l I.D. NA3082 Packing Group: III

D. CERCLA Reportable Quantity (RQ) and units (Lb, Kg): 10 Lb

E. Non-Bulk code 203 Bulk code 241

F. Special Provisions ___ ___ ___ ___ ___ ___

G. Labels Required CLASS 9

28. SPECIAL HANDLING INFORMATION

_ Material Safety Data Sheets Attached

29. OTHER INFORMATION

30. CHEMICAL WASTE MANAGEMENT CERTIFICATION

Chemical Waste Management, Inc. has all the necessary permits and licenses for the waste that has been characterized and identified by this approved profile.

Date Printed 03/19/99

Profile # VIC AC3174 6-4

31. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

METALS	TCLP Information: Check only ONE for each constituent Use units: ppm, mg/l				TCLP Data	TCA or TOTAL Use units: ppm, mg/l, mg/kg or percent				
						California List				
	Less Than	TC Regulated Level	Equal or More	Waste No.	TCLP Actual	Less Than	Regulated Level	Equal or More	Actual	
Arsenic as As	X	5.0 mg/l		D004			500 mg/l			
Barium as Ba	X	100.0 mg/l		D005						
Cadmium as Cd		1.0 mg/l	X	D006		X	100 mg/l		4.6	mg/l
Chromium tot Cr		5.0 mg/l	X	D007					150	mg/l
Lead as Pb		5.0 mg/l	X	D008		X	500 mg/l		9.1	mg/l
Mercury as Hg	X	.2 mg/l		D009			20 mg/l			
Selenium as Se	X	1.0 mg/l		D010			100 mg/l			
Silver as Ag	X	5.0 mg/l		D011						
Nickel as Ni						X	134 mg/l		1.3	mg/l
Thallium as Tl							130 mg/l			
Chromium Hex							500 mg/l			
Antimony										
Beryllium										
Copper										
Vanadium										
Zinc										
Iron									80	mg/l

Date Printed 03/19/99

Profile # VIC AC3174 G-5

32. OTHER HAZARDOUS CONSTITUENTS Indicate if the waste contains any of the following.

ORGANICS	TCLP Information: Check only ONE for each constituent				TCLP Data	TCA or TOTAL Use units: ppm, mg/l or %
	Less Than	Regulated Level	Equal or More	Waste No.	TCLP Analytical Test Results Use units: ppm or mg/l	
Benzene	X	0.5 mg/l		D018		
Carbon Tetrachloride	X	0.5 mg/l		D019		
Chlordane	X	0.03 mg/l		D020		
Chlorobenzene	X	100.0 mg/l		D021		
Chloroform	X	6.0 mg/l		D022		
m-Cresol	X	200 mg/l		D024		
o-Cresol	X	200.0 mg/l		D023		
p-Cresol	X	200.0 mg/l		D025		
Cresol	X	200.0 mg/l		D026		
2,4-D	X	10.0 mg/l		D016		
1,4 Dichlorobenzene	X	7.5 mg/l		D027		
1,2-Dichloroethane	X	0.5 mg/l		D028		
1,1-Dichloroethylene	X	0.7 mg/l		D029		
2,4-Dinitrotoluene	X	0.13 mg/l		D030		
Endrin	X	.02 mg/l		D012		
Heptachlor, & Hydroxide	X	0.008 mg/l		D031		
Hexachloro-1,3 Butadiene	X	0.5 mg/l		D033		
Hexachlorobenzene	X	0.13 mg/l		D032		
Hexachloroethane	X	3.0 mg/l		D034		
Lindane	X	0.4 mg/l		D013		
Methoxychlor	X	10.0 mg/l		D014		
Methyl Ethyl Ketone	X	200.0 mg/l		D035		
Nitrobenzene	X	2.0 mg/l		D036		
Pentachlorophenol	X	100.0 mg/l		D037		
Pyridine	X	5.0 mg/l		D038		
Tetrachloroethylene	X	0.7 mg/l		D039		
Toxaphene	X	0.5 mg/l		D015		
2,4,5-TP Silvex	X	1.0 mg/l		D017		
Trichloroethylene	X	0.5 mg/l		D040		
2,4,5-Trichlorophenol	X	400.0 mg/l		D041		
2,4,6-Trichlorophenol	X	2.0 mg/l		D042		
Vinyl Chloride	X	0.2 mg/l		D043		

Attachment H

CERTIFICATE OF ANALYSIS

Service Location	Received	Project	Lab ID
HERITAGE ENVIRONMENTAL SERVICES, LLC COMMERCIAL LABORATORY OPERATIONS 7901 W. MORRIS ST. INDIANAPOLIS, IN 46231 (317)243-8305	12-AUG-99	13	H136858
	Complete: 07-OCT-99	PO Number: 480118437*	
	Printed: 18-OCT-99	Sampled:	

Report To	Bill To
INTERNAL COORDINATORS HERITAGE ENVIRONMENTAL SERVICES LLC 7901 WEST MORRIS STREET INDIANAPOLIS, IN 46231-3301	WINDE HAMRICK HERITAGE ENVIRONMENTAL SERVICES LLC 7901 WEST MORRIS STREET INDIANAPOLIS, IN 46231

Sample Description

CLIENT ID: .
GENERATOR: BOMBARDIER
DESCRIPTION: . Stripper Waste Water
SALESMAN: .
GENERATOR LOCATION: .

TOTAL SOLIDS EPA 160.3
Analyst: P. HANLIN Analysis Date: 12-AUG-99 18:00 Test: G401.7.0

Parameter	Result	Det. Limit	Units
SOLIDS	0.11	0.001	Percent

TOTAL PETROLEUM HYDROCARBONS (GRAVIMETRIC) SM 5520F 18TH
Analyst: J. RADER Analysis Date: 12-AUG-99 Test: G502.8.0

Parameter	Result	Det. Limit	Units
PETROLEUM HYDROCARBONS	120	100	mg/kg

PH (AQUEOUS) SW846-9040B
Analyst: A. LAZOWSKI Analysis Date: 12-AUG-99 Test: G607.5.0

Parameter	Result	Det. Limit	Units
PH	3.02	0.10	Std. Units

CHLORIDE (ARGENTOMETRIC) SM 407A 16TH
Analyst: A. LAZOWSKI Analysis Date: 12-AUG-99 Test: G102.4.0

Parameter	Result	Det. Limit	Units
CHLORIDE	BDL	100	mg/kg

CHEMICAL OXYGEN DEMAND (COLORIMETRIC) EPA 410.4
Analyst: J. KLINGEL Analysis Date: 12-AUG-99 Test: G301.1.0

Parameter	Result	Det. Limit	Units
CHEMICAL OXYGEN DEMAND	4400	1000	mg/kg

CYANIDE DISTILLATION SW846-9010A
Analyst: P. HANLIN Analysis Date: 12-AUG-99 16:00 Instrument: PREP Test: P101.4.0

 (continued on next page)

HERITAGE ENVIRONMENTAL SERVICES, LLC **Sample ID: H136858 .**

Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	10		Grams
FINAL VOLUME	250		mL

CYANIDE, TOTAL (AUTOMATED) SW846-9012
Analyst: J. ALLEN Analysis Date: 16-AUG-99 12:45 Instrument: AUTO-ANALYZER Test: G1D1.4.0 INDI
Prep: CYANIDE DISTILLATION SW846-9010A P1D1.4.0

Parameter	Result	Det. Limit	Units
CYANIDE	1.7	0.25	mg/kg

CYANIDE, WEAK ACID DISSOCIABLE HTC 1
Analyst: K. SMITH Analysis Date: 07-OCT-99 Test: G118.2.0 INDI

Parameter	Result	Det. Limit	Units
CYANIDE, WEAK ACID DISSOCIABLE	0.278		mg/L

CYANIDE AMENABLE DISTILLATION SW846-9010A
Analyst: P. HANLIN Analysis Date: 12-AUG-99 16:00 Instrument: PREP Test: P111.4.0

Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	10		Grams
FINAL VOLUME	250		mL

CYANIDE, AMENABLE TO CHLORINATION (AUTOMATED) SW846-9012
Analyst: J. ALLEN Analysis Date: 16-AUG-99 12:45 Instrument: AUTO-ANALYZER Test: G111.4.0 INDI
Prep: CYANIDE AMENABLE DISTILLATION SW846-9010A P111.4.0

Parameter	Result	Det. Limit	Units
CYANIDE, AMENABLE	BDL	0.25	mg/kg

PHENOLICS DISTILLATION SW846-9065
Analyst: J. KLINGEL Analysis Date: 12-AUG-99 Instrument: PREP Test: P405.7.0

Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	1		Grams
FINAL VOLUME	100		mL

PHENOLICS 4AAP (AUTOMATED) SW846-9066
Analyst: J. ALLEN Analysis Date: 16-AUG-99 07:45 Instrument: AUTO-ANALYZER Test: G405.7.0 INDI
Prep: PHENOLICS DISTILLATION SW846-9065 P405.7.0

Parameter	Result	Det. Limit	Units
PHENOLICS	3.9	1.0	mg/kg

FAA OR ICP ACID DIGESTION OF S/S/S SAMPLES SW846-3050A
Analyst: A. LAZOWSKI Analysis Date: 12-AUG-99 Instrument: PREP Test: P129.7.0

Parameter	Result	Det. Limit	Units
INITIAL WEIGHT OR VOLUME	1		Grams
FINAL WEIGHT OR VOLUME	100		mL

CHROMIUM ICP SW846-6010B
Analyst: J. KRAMER Analysis Date: 13-AUG-99 23:55 Instrument: ICP Test: M110.3.0 INDI
Prep: FAA OR ICP ACID DIGESTION OF S/S/S SAMPLES SW846-3050A P129.7.0

Parameter	Result	Det. Limit	Units
CHROMIUM	32.	5.0	mg/kg
DILUTION 1:5			

HERITAGE ENVIRONMENTAL SERVICES, LLC **Sample ID: H136858 .**

HEXAVALENT CHROMIUM SW846-7196A
Analyst: J. KLINGEL Analysis Date: 12-AUG-99 Test: M110.6.0

Parameter	Result	Det. Limit	Units
HEXAVALENT CHROMIUM	10	1.0	mg/kg

CRVI DUP=7.5 PPM

NICKEL TREATABILITY WITH SPIKE HTC 1
Analyst: A. LAZOWSKI Analysis Date: 12-AUG-99 Test: G529.1.0

Parameter	Result	Det. Limit	Units
INITIAL CONCENTRATION	2.0	0.2	mg/L
NICKEL TREATABILITY	2.2		mg/L
NICKEL SPIKE TREATABILITY	2.6		mg/L

1:10 BENCH DILUTION (ACID).

PHYSICAL APPEARANCE SAS
Analyst: J. RAVER Analysis Date: 12-AUG-99 Test: G622.0.0

Parameter	Result	Det. Limit	Units
COLOR	*		
PHYSICAL STATE	**		
NUMBER OF LAYERS	1		
PHYSICAL APPEARANCE	***		

**Yellow*
***Liquid*
****Non-foamy, non-viscous*

Sample Comments

ANALYSES PERFORMED COMPLY WITH THE HERITAGE WASTE ANALYSIS QUALITY ASSURANCE PLAN.

* See Note for Parameter
** See Note for Parameter
*** See Note for Parameter
BDL Below Detection Limit

Sample was received outside of holding time.
Sample was received on ice.

Approved : ______________________